

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC. ,

Defendants.

CASE NO. 1:17-cv-02635-CAB

DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS

Pursuant to the Court's May 6, 2022 order (Text Order adopting Dkt. 149) the Court's Civil Trial Order and the Court's August 17, 2022 order (Order granting Dkt. 179) Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, "Take-Two") respectfully submit the following objections and counter-designations. Defendants' counter-designations are not an admission that such testimony is appropriate for use by Plaintiff at trial.

In addition to the below specific objections, Take-Two generally objects to Plaintiff's excessive over-designation of deposition testimony. Some of Plaintiff's designations comprise nearly the entirety of a witness's multiple-hours-long deposition. Among Plaintiff's designations are hundreds of counsel's objections and other discussions between counsel, including about breaks and other irrelevant information. This tactic of over-designating large blocks of testimony not only makes it unduly burdensome for Take-Two to review and formulate objections, it also creates disputes for the Court concerning designations that Plaintiff likely has no real intent to offer at trial, and in fact could not be offered as a practical matter given their sheer length.

Further, Defendants reserve the right to submit as counter-designated deposition testimony any testimony affirmatively designated by Plaintiff, regardless of whether Plaintiff later withdraws that affirmative testimony, as Defendants did not counter-designate testimony where Plaintiff has already affirmatively designated such testimony. Defendants further reserve their right to submit any deposition testimony counter-designated by Defendants as if they affirmatively designated such testimony; to supplement their designations, including designations for authentication purposes; and to use any deposition testimony that does not appear in these designations for purposes of impeachment. Defendants are continuing their investigation and trial preparation and reserve the right, in appropriate circumstances and in accordance with all applicable Federal Rules, Local Rules, and Court Orders, to amend, supplement, and/or withdraw their designations, including, but not limited to, in response to further negotiations between the parties, Court Orders and rulings, and other developments in the case.

A. ALFIE BRODY

Defendants submit the below counter-designations and objections to the designations for the deposition of Alfie Brody:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
8:10 – 9:19	8:17 - 8:22 Q; T	19:7 - 19:8
11:11 – 17:9	13:3 - 13:3 Q; T 13:14 - 13:14 Q; T 14:2 - 14:2 Q; T 14:21 - 14:21 Q; T 15:6 - 15:6 Q; T	45:5 - 45:7
19:10 – 21:11	20:10 - 20:10 Q; T 20:15 - 21:11 R	
24:23 – 32:17	24:23 - 24:24 R; 403; V; A 24:25 - 24:25 Q; T 25:1 - 25:1 R; 403; V:A 25:3 - 25:18 R 25:19 - 25:19 Q; T 25:20 - 25:20 R 27:9 - 27:9 Q; T 27:14 - 27:15 R; 403 27:16 - 27:16 Q; T 27:17 - 29:9 R; 403 29:10 - 29:14 K; F; S; R; 403 29:12 - 29:12 Q; T 29:16 - 31:2 K; F; S; R; 403 31:3 - 31:3 Q; T 31:4 - 31:9 K; F; S; R; 403 31:10 - 31:13 R 31:14 - 31:14 Q; T 31:15 - 32:17 R	
35:22 – 38:21	36:4 - 36:5 Q; T 36:13 - 36:13 Q; T 37:17 - 38:11 R; 403 38:12 - 38:12 Q; T 38:15 - 38:16 R; 403 38:17 - 38:17 Q; T 38:18 - 38:21 R; 403	
40:12 – 45:4	40:12 - 40:14 LC; K; F; S; R; 403	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	40:15 - 41:8 LC; K; F; S; R; 403 41:12 - 41:12 Q; T 41:22 - 41:22 Q; T 42:19 - 42:19 Q; T 43:4 - 43:5 Q; T 44:4 - 44:8 Q; T 44:24 - 44:24 Q; T	
49:24 – 52:25	49:24 - 52:25 R; 403	
53:9 – 66:15	53:20 - 53:20 Q; T 54:3 - 54:3 Q; T 54:7 - 54:19 R; 403 54:20 - 54:20 Q; T 54:21 - 56:13 R; 403 56:14 - 56:14 Q; T 56:15 - 57:19 R; 403 57:20 - 57:20 Q; T 57:21 - 59:1 R; 403 59:2 - 59:2 Q; T 59:3 - 59:12 R; 403; MIL 59:13 - 59:13 Q; T 59:14 - 59:15 R; 403; MIL 59:17 - 59:23 R; 403 59:24 - 59:24 Q; T 59:25 - 60:6 R; 403 60:7 - 60:10 R; 403; M; S; F 60:11 - 60:11 Q; T 60:12 - 60:16 R; 403; M; S; F 60:17 - 60:17 Q; T 60:18 - 60:20 R; 403; M; S; F 62:5 - 62:5 Q; T 63:18 - 63:19 V; F; S; K 63:20 - 63:20 Q; T 63:21 - 64:3 V; F; S; K 64:6 - 64:6 Q; T 64:14 - 64:18 K; F 66:13 - 66:15 R	
71:11 – 96:16	71:16 - 72:5 R; 403 72:6 - 72:6 Q; T 72:7 - 72:8 R; 403 72:10 - 72:21 R; 403; HR; A	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	72:10 - 73:21 R; 403	
	72:24 - 72:24 Q; T	
	73:22 - 75:1 R; 403	
	75:9 - 79:6 R; 403	
	77:3 - 77:3 Q; T	
	78:11 - 78:11 Q; T	
	79:4 - 79:4 Q; T	
	79:8 - 81:2 R; 403	
	81:3 - 81:3 Q; T	
	81:5 - 82:10 R; 403	
	82:8 - 82:8 Q; T	
	83:1 - 83:1 Q; T	
	83:23 - 84:5 R; 403; F; S; K	
	84:6 - 84:10 R; 403; HR	
	84:8 - 84:8 Q; T	
	84:12 - 84:18 R; 403	
	84:19 - 85:20 Q; T	
	85:21 - 86:16 Q; T	
	86:18 - 90:9 R; 403	
	86:22 - 86:23 Q; T	
	87:8 - 87:8 Q; T	
	88:7 - 88:7 Q; T	
	88:21 - 88:21 Q; T	
	89:6 - 89:6 Q; T	
	89:17 - 89:17 Q; T	
	89:23 - 89:25 F; K; S	
	89:24 - 89:24 Q; T	
	90:5 - 90:5 Q; T	
	90:10 - 90:15 F; K; S	
	90:16 - 90:16 Q; T	
	90:17 - 90:22 F; K; S	
	91:6 - 91:6 Q; T	
	91:13 - 91:16 403; R; S; F	
	91:15 - 91:15 Q; T	
	92:2 - 92:10 M; V	
	92:6 - 92:6 Q; T	
	92:12 - 93:5 R; 403	
	93:10 - 93:10 Q; T	
	93:18 - 94:25 R; 403	
	94:13 - 94:13 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	95:1 - 95:22 R; K; 403; S; F; V 95:3 - 95:3 Q; T 95:14 - 95:14 Q; T 95:23 - 96:16 F; S; K 95:25 - 95:25 Q; T	
96:23 – 110:10	96:25 - 97:9 Q; T 98:19 - 98:19 Q; T 98:23 - 102:3 F; S; K; HR 99:4 - 99:4 Q; T 99:15 - 99:15 Q; T 101:11 - 101:11 Q; T 102:6 - 102:15 S; K 102:8 - 102:8 Q; T 102:17 - 102:17 Q; T 103:7 - 103:19 R; 403 104:1 - 104:1 Q; T 104:20 - 104:24 T 104:25 - 105:5 Q; T 105:21 - 105:24 S; F 106:4 - 107:9 R; 403; S; K 106:5 - 106:5 Q; T 107:16 - 107:16 Q; T 108:22 - 108:22 Q; T 109:20 - 109:20 Q; T	
111:2 – 121:11	111:2 - 111:8 S; K; F 111:5 - 111:7 Q; T 111:20 - 111:20 Q; T 111:23 - 113:8 R; 403 113:9 - 113:9 Q; T 113:10 - 114:9 R; 403 114:10 - 114:10 Q; T 114:12 - 115:23 R; 403; S; K; F 115:1 - 115:1 Q; T 115:7 - 115:7 Q; T 115:24 - 118:6 S; K; F 116:12 - 116:12 Q; T 117:10 - 117:10 Q; T 117:18 - 117:18 Q; T 118:2 - 118:2 Q; T 118:14 - 121:8 R; 403	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	118:16 - 118:16 Q; T 119:14 - 119:14 Q; T 119:20 - 119:20 Q; T 120:20 - 120:20 Q; T 121:1 - 121:1 Q; T	
124:23 – 129:5	125:4 - 125:19 Q; T 127:10 - 127:10 Q; T 127:22 - 129:5 R; 403 127:23 - 127:23 Q; T 129:4 - 129:4 Q; T	
130:12 – 141:5	130:12 - 136:23 F; R; 403 131:7 - 131:14 Q; T 132:5 - 132:5 Q; T 132:23 - 132:23 Q; T 133:3 - 133:3 Q; T 133:10 - 133:10 Q; T 133:16 - 133:16 Q; T 133:24 - 133:25 Q; T 134:7 - 134:7 Q; T 135:13 - 135:13 Q; T 136:12 - 136:12 Q; T 136:17 - 136:17 Q; T 136:24 - 140:11 R; 403 140:18 - 141:6 F; S; K	
145:5 – 145:10		
152:1 – 161:15	152:2 - 161:15 R; 403; MIL; K; S; F 152:9 - 152:9 Q; T 153:3 - 153:3 Q; T 153:13 - 153:14 Q; T 154:1 - 154:7 Q; T 154:18 - 154:18 Q; T 155:13 - 155:13 Q; T 155:19 - 155:19 Q; T 156:10 - 156:10 Q; T 156:21 - 156:21 Q; T 158:2 - 158:2 Q; T 158:9 - 158:9 Q; T 158:14 - 158:22 Q; T 159:7 - 159:7 Q; T 159:23 - 159:23 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	160:4 - 160:4 Q; T 161:3 - 161:3 Q; T	
176:9 – 178:17	176:9 - 177:5 R; 403 177:6 - 178:17 R; 403; F; K; S 177:8 - 177:8 Q; T 177:14 - 177:14 Q; T 177:19 - 177:19 Q; T 178:2 - 178:2 Q; T 178:9 - 178:9 Q; T 178:15 - 178:15 Q; T	

B. ANTON DAWSON

Defendants submit the below counter-designations and objections to the designations for the deposition of Anton Dawson:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
7:20 – 10:22		11:18 - 11:23
13:4 – 14:7		14:13 - 14:15
17:22 – 30:14	18:20 - 18:25 R 19:1 - 19:4 V 20:3 - 20:13 R 20:14 - 20:22 R; S; F 21:8 - 21:16 R; F; K; S 21:17 - 21:17 Q; T 21:19 - 21:21 R; F; K; S 21:22 - 22:4 R; F 22:5 - 23:14 R 23:21 - 29:2 R 29:9 - 30:14 R	15:7 - 15:22
38:10 – 39:11		16:15 - 16:24
46:23 – 52:18	46:23 - 46:24 Incomplete answer 47:13 - 47:13 Q; T 47:19 - 47:19 Q; T 48:6 - 48:14 Q; T 48:16 - 48:17 F	17:16 - 17:17

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	48:18 - 48:19 Q; T 48:20 - 48:22 F 49:3 - 49:4 F; M; V 49:5 - 49:6 Q; T 49:7 - 49:12 F; M; V 49:21 - 49:22 M; V 49:23 - 49:23 Q; T 49:24 - 50:6 F; M 50:7 - 50:7 T 50:8 - 50:10 V 50:11 - 50:15 V 50:17 - 50:18 F; M; V 50:19 - 50:20 Q; T 50:21 - 50:24 F; M; V 51:14 - 51:23 R; F; K 51:24 - 52:2 R; F; K 52:3 - 52:13 R; F; K 52:6 - 52:10 R; F; K 52:16 - 52:17 Q; T	
54:10 – 63:17	54:25 - 55:1 R; F; V 55:2 - 55:2 Q; T 55:3 - 55:9 R; F; V 55:11 - 55:15 R; F; V 55:16 - 55:17 Q; T 55:18 - 55:21 R; F; V 56:1 - 56:1 Q; T 57:6 - 57:6 Q; T 57:10 - 57:12 H; V; R 57:13 - 57:14 Q; T 57:15 - 57:22 H; V; R 57:24 - 58:8 H; V; R 58:21 - 58:21 Q; T 59:6 - 59:12 H; V; R; M 59:13 - 59:15 Q; T 59:16 - 61:7 H; V; R; M 61:8 - 61:11 V 61:12 - 61:13 V; F 61:14 - 61:14 Q; T 61:15 - 61:16 V; F 61:18 - 61:19 V; F	17:18 - 17:20

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	61:20 - 61:20 Q; T 61:21 - 62:3 V; F 62:5 - 62:8 V; F; S; M 62:9 - 62:10 Q; T 62:11 - 62:14 V; F; S; M 62:18 - 62:19 Q; T 63:4 - 63:5 V; S; F; K 63:6 - 63:6 Q; T 63:7 - 63:8 V; S; F; K 63:10 - 63:12 V; S; F; R; K 63:13 - 63:13 Q; T 63:14 - 63:17 V; S; F; R; K	
75:2 – 87:20	75:2 - 75:5 V; F 75:6 - 75:7 Q; T 75:8 - 75:10 V; F 75:11 - 75:11 T; Q 75:12 - 75:14 F; M; S; H 75:15 - 75:16 Q; T 75:20 - 75:21 Q; T 75:23 - 75:24 F; S 75:25 - 75:25 Q; T 76:6 - 76:10 M; F 76:11 - 76:15 Q; T 76:20 - 76:20 Q; T 76:21 - 76:23 M; F 76:24 - 76:24 Q; T 76:25 - 77:2 M 77:3 - 77:4 Q; T 77:5 - 77:7 M 77:24 - 78:2 V 78:3 - 78:22 Q; T 78:23 - 78:25 V 79:1 - 79:13 M; V 79:14 - 79:14 Q; T 79:15 - 79:17 M; V 80:9 - 80:18 F; HR 80:19 - 80:20 S; V; F 80:21 - 80:21 Q; T 80:22 - 80:25 S; V; F 81:7 - 81:9 S; R; F; M	104:15 - 104:22

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	81:10 - 81:10 Q; T 81:11 - 81:24 S; R; F; M 81:25 - 82:1 Q; T 82:2 - 82:3 S; R; F; M 82:5 - 82:14 S; R; F; M; HR 82:15 - 82:16 Q; T 82:17 - 82:21 S; R; F; M; HR 82:25 - 83:18 S; R; F; M; HR 83:19 - 83:20 S; F; H 83:21 - 83:21 Q; T 83:22 - 83:23 S; F; H 84:5 - 84:11 S; F; R 84:14 - 84:16 Q; T 84:22 - 84:24 S; F; H 84:25 - 85:1 Q; T 85:2 - 85:7 S; F; H 85:9 - 85:9 S; F; H 85:10 - 85:11 Q; T 85:12 - 85:14 S; F; H 85:16 - 85:17 Q; T 85:18 - 86:5 F; S; R 86:6 - 86:8 Q; T 86:9 - 86:11 F; S; R 86:12 - 86:12 Q; T 86:13 - 87:4 F; S; R; HR	
92:17 – 93:19	92:17 – 93:19 R	105:6 - 105:8
94:1 – 104:14	94:1 - 94:4 R; V 94:5 - 94:6 R 94:7 - 94:7 Q; T 94:8 - 94:15 R 94:17 - 94:22 R 94:23 - 96:21 R; F 96:22 - 96:23 Q; T 96:24 - 97:20 R; F; V 97:21 - 97:21 Q; T 97:22 - 97:23 R; F; V 97:24 - 97:24 Q; T 97:25 - 98:2 V; R; F; H 98:3 - 98:3 Q; T 98:4 - 98:15 V; F; R; H	105:11 - 105:14

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	98:16 - 98:16 V; F; LC 98:17 - 98:17 Q; T 98:18 - 98:19 V; F; LC 98:21 - 98:21 V; F; H 98:22 - 98:23 Q; T 98:24 - 99:4 V; F; H 99:5 - 99:8 Q; T 99:9 - 99:10 R; F; K; HR 100:7 - 100:7 Q; T 100:8 - 100:8 Q; T 100:9 - 100:14 Q; T 101:5 - 101:6 Q; T 101:10 - 101:11 Q; T 101:16 - 101:17 M; F 101:18 - 102:5 F 102:6 - 102:22 R; F 102:25 - 103:1 F; R 103:2 - 103:2 Q; T 103:3 - 103:3 F; R 103:5 - 103:8 R 103:9 - 103:11 R; F 103:12 - 103:12 Q; T 103:13 - 103:14 R; F	
106:22 – 117:18	107:8 - 107:8 Q; T 108:3 - 108:3 Q; T 108:4 - 108:17 R 108:25 - 108:25 Q; T 109:1 - 109:4 V; R 109:5 - 109:6 Q; T 109:7 - 109:12 R; V 109:14 - 109:15 M; F 109:16 - 109:17 Q; T 109:18 - 109:21 M; F 109:23 - 109:25 M; V; F 110:1 - 110:1 Q; T 110:2 - 110:3 M; V; F 110:5 - 110:14 M; V; F; R 110:15 - 110:16 M; V; F; R 110:17 - 110:17 Q; T 110:18 - 110:21 M; V; F; R	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	110:23 - 110:25 M; V; F:R 111:1 - 111:2 Q; T 111:3 - 111:9 M; V; F:R 111:14 - 111:14 Q; T 111:23 - 112:14 R 112:15 - 113:9 F; S 113:10 - 113:10 Q; T 113:11 - 113:25 F; S; V 114:1 - 114:3 Q; T 114:4 - 114:8 F; S; V 114:10 - 114:18 F; S; M; V 114:19 - 114:19 Q; T 114:20 - 114:20 F; S; M; V 114:22 - 114:23 F 114:24 - 114:25 Q; T 115:1 - 115:3 F 115:5 - 115:16 F; V 115:17 - 115:17 T; Q 115:18 - 115:19 F; V 115:21 - 115:23 F; V 115:24 - 115:24 Q; T 115:25 - 116:5 F; V 116:6 - 116:6 Q; T 116:7 - 116:13 F; V 116:14 - 116:15 Q; T 116:16 - 116:21 F; V 116:22 - 116:22 Q; T 116:23 - 117:4 F; V 117:5 - 117:5 Q; T 117:6 - 117:16 F; V 117:17 - 117:17 Q; T 117:18 - 117:18 F; V	
118:12 – 20		
128:7 – 130:6	128:7 - 128:10 F; V; R 128:11 - 128:19 Q; T 128:20 - 129:5 R; V 129:6 - 129:8 Q; T 129:10 - 129:11 R 129:12 - 129:13 V; R 129:14 - 129:16 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	129:18 - 129:19 V; R 129:20 - 129:22 Q; T 129:23 - 129:23 V; R 129:24 - 130:6 Q; T	

C. MICHAEL STAUFFER

Defendants submit the below counter-designations and objections to the designations for the deposition of Michael Stauffer:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
5:14 – 18:24	5:19 - 6:17 R 6:25 - 7:3 V 7:12 - 7:17 V 8:12 - 8:15 R 9:2 - 9:9 Q; T 9:11 - 9:18 R 9:19 - 9:19 Q; T 9:20 - 9:23 R 9:24 - 9:25 Q; T 10:22 - 10:23 V; R 11:23 - 12:1 V; R 12:2 - 12:3 Q; T 12:4 - 12:11 V; R 12:12 - 12:13 Q; T 12:14 - 12:16 V; R 12:17 - 12:18 Q; T 12:19 - 13:7 R; V 14:1 - 14:2 R; V 14:3 - 14:4 Q; T 14:5 - 14:11 R; V 15:2 - 15:13 V; R 15:13 - 15:15 V; R 15:16 - 15:16 Q; T 15:17 - 15:19 V; R 15:25 - 16:1 Q; T 16:5 - 16:5 Q; T	43:18 - 43:19

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	16:11 - 16:20 R; V 16:21 - 16:23 R; V 16:24 - 16:24 Q; T 16:25 - 17:5 R; V 17:6 - 17:7 Q; T 17:8 - 17:12 R; V 17:18 - 17:19 F; V 17:20 - 17:20 Q; T 17:21 - 17:23 F; V 17:24 - 18:2 F; V 18:3 - 18:4 Q; T 18:5 - 18:13 F; V	
22:22 – 27:4	22:22 - 22:23 F; V; A 22:24 - 22:25 Q; T 23:1 - 23:9 F; V; A 23:10 - 23:11 Q; T 23:12 - 23:13 F; V; A 23:14 - 23:18 F; V; A 23:19 - 23:20 Q; T 23:21 - 23:25 F; V; A 24:1 - 24:3 F; S; V; M 24:4 - 24:6 Q; T 24:7 - 24:11 F; S; V; M 24:12 - 24:14 F; S; V; H 24:15 - 24:16 Q; T 24:17 - 24:22 F; S; V; H 24:23 - 25:8 Q; T 25:9 - 25:11 F; S; V; H 25:12 - 25:14 F; S; V; H; M 25:15 - 25:15 Q; T 25:16 - 25:18 F; S; V; H; M 25:19 - 25:20 V; F 25:21 - 25:21 Q; T 25:22 - 25:23 V; F 25:24 - 25:25 M; F; S; V 26:1 - 26:2 Q; T 26:3 - 26:5 M; F; S; V 26:6 - 26:7 Q; T 26:8 - 26:11 M; F; S; V 26:12 - 26:13 M; V; R 26:14 - 26:15 Q; T	43:21 - 43:21

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	26:16 - 26:16 M; V; R 26:17 - 26:22 M; F; S; V 26:23 - 26:25 M; V; R 27:1 - 27:2 Q; T 27:3 - 27:4 M; V; R	
30:8 – 25	30:13 - 30:25 R	94:17 - 94:19
32:4 – 42:12	32:4 - 33:8 R 33:9 - 33:10 Q; T 33:11 - 33:12 R 33:13 - 33:18 Q; T 33:19 - 33:20 S; V; F; R 33:21 - 33:21 Q; T 33:22 - 33:23 S; V; F; R 33:24 - 33:25 R; V 34:1 - 34:2 Q; T 34:3 - 34:4 R; V 34:5 - 34:8 Q; T 34:9 - 34:13 R; V; S; F 34:14 - 34:15 Q; T 34:16 - 34:22 R; V; S; F 34:23 - 34:24 Q; T 34:25 - 35:3 R; V; S; F 35:4 - 35:17 R; V 35:18 - 35:18 Q; T 35:19 - 35:20 R; V 35:21 - 35:22 R; V; F; S 35:23 - 35:23 Q; T 35:24 - 35:25 R; V; F; S 36:24 - 36:24 Q; T 37:12 - 37:12 Q; T 37:17 - 37:17 Q; T 37:19 - 37:20 Q; T 37:21 - 37:22 V; M 37:23 - 37:23 Q; T 37:24 - 37:25 V; M 38:1 - 38:7 V 38:8 - 38:8 Q; T 38:9 - 38:15 V 38:16 - 38:24 R 38:25 - 38:25 Q; T	94:21 - 95:13

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	39:1 - 39:4 R 39:5 - 39:5 Q; T 39:6 - 39:8 R 39:9 - 39:11 R; S; F 39:12 - 39:13 Q; T 39:14 - 39:17 R; S; F 39:18 - 39:19 Q; T 39:20 - 39:21 R; S; F 39:22 - 39:23 Q; T 39:24 - 39:25 R; S; F 40:1 - 40:2 R 40:3 - 40:3 Q; T 40:4 - 41:2 R 41:3 - 41:25 R 42:1 - 42:1 Q; T 42:2 - 42:12 R	
53:13 – 54:13	53:13 - 54:1 R 54:2 - 54:2 Q; T 54:3 - 54:7 R 54:8 - 54:9 Q; T 54:10 - 54:13 R	111:19 - 112:3
66:7 – 90:16	66:7 - 66:7 V; R; F 66:8 - 66:9 Q; T 66:10 - 66:22 V; R; F 66:23 - 66:23 Q; T 66:24 - 67:3 V; R; F 67:4 - 67:4 Q; T 67:5 - 68:2 V; R; F 68:3 - 68:16 R 68:17 - 68:20 Q; T 68:21 - 68:22 V 68:23 - 68:23 Q; T 68:24 - 69:1 V 69:2 - 69:2 Q; T 69:3 - 69:10 V 69:11 - 69:11 Q; T 69:12 - 69:13 V 69:14 - 69:15 Q; T 69:16 - 69:19 R; V 69:21 - 70:1 R; V 70:3 - 70:6 R; V	141:4 - 141:5

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	70:7 - 70:12 R	
	70:13 - 70:15 F; A	
	70:16 - 70:17 Q; T	
	70:18 - 70:20 F; A	
	70:25 - 71:1 Q; T	
	71:4 - 71:8 V; R	
	71:9 - 71:9 Q; T	
	71:10 - 71:16 R; V	
	71:17 - 71:18 R; S; F	
	71:19 - 71:19 Q; T	
	71:20 - 71:20 R; S; V	
	71:21 - 72:1 V; R	
	72:2 - 72:2 Q; T	
	72:3 - 72:10 R; V; S; F	
	72:11 - 72:12 S; F; R; V	
	72:13 - 72:14 Q; T	
	72:15 - 72:17 S; F; R; V	
	72:18 - 72:19 Q; T	
	72:20 - 72:24 S; F; R; V	
	72:25 - 73:2 S; F; R; V; M	
	73:3 - 73:5 Q; T	
	73:6 - 73:8 Q; T	
	73:9 - 73:10 S; F; R; V; M	
	73:11 - 73:12 S; F; R; V	
	73:13 - 73:13 Q; T	
	73:14 - 73:19 S; F; R; V	
	73:20 - 73:21 Q; T	
	73:22 - 74:1 S; F; R; V	
	74:2 - 74:3 Q; T	
	74:4 - 74:7 S; F; R; V	
	74:8 - 74:9 Q; T	
	74:10 - 75:12 R	
	75:13 - 75:14 Q; T	
	75:15 - 76:22 R	
	76:23 - 77:11 R; F	
	77:12 - 77:14 Q; T	
	77:15 - 77:15 R; F	
	77:16 - 78:12 R; F; S; K; HR	
	78:13 - 78:13 Q; T	
	78:14 - 78:15 R; F; S; K; HR	
	78:16 - 78:17 A; R; V; F; K	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	78:18 - 78:19 Q; T	
	78:20 - 79:5 A; R; V; F; K	
	79:6 - 79:7 Q; T	
	79:8 - 79:8 A; R; V; F; K	
	79:9 - 79:16 R	
	79:17 - 79:18 Q; T	
	79:19 - 80:19 V; R	
	80:20 - 80:21 Q; T	
	80:22 - 80:23 R; V	
	80:24 - 81:4 R; V; M; F	
	81:5 - 81:6 Q; T	
	81:7 - 81:9 R; V; M; F	
	81:10 - 81:18 R; V; M; F	
	81:19 - 81:22 Q; T	
	81:23 - 82:7 R; V	
	82:8 - 82:22 R	
	82:23 - 82:24 R; F; K; V	
	82:25 - 83:1 Q; T	
	83:2 - 83:8 R; F; K; V	
	83:9 - 83:10 Q; T	
	83:11 - 83:14 R; F; K; V	
	83:15 - 83:16 Q; T	
	83:17 - 83:18 R; F; K; V	
	83:19 - 83:21 R; F; K; V	
	83:22 - 83:23 Q; T	
	83:24 - 84:5 R; F; K; V	
	84:6 - 84:7 Q; T	
	84:8 - 84:11 R; F; K	
	84:12 - 84:12 Q; T	
	84:13 - 84:14 R; F; K; V	
	84:15 - 85:20 R; F; HR	
	85:21 - 86:2 F; S; R	
	86:3 - 86:14 R	
	86:15 - 87:1 R; F	
	87:2 - 87:4 F; S	
	87:5 - 87:5 Q; T	
	87:6 - 87:10 F; S; R	
	87:11 - 87:12 Q; T	
	87:13 - 87:13 F; S; R	
	87:14 - 87:16 F; S; R	
	87:17 - 87:18 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	87:19 - 87:20 F; S; R 87:21 - 87:23 R; F; S 87:24 - 87:25 R; F; S; V 88:1 - 88:1 Q; T 88:2 - 88:5 R; F; S; V 88:6 - 88:20 R; S 88:21 - 89:5 R; S; F; HR 89:6 - 89:7 Q; T 89:8 - 90:5 R; S; F; HR 90:6 - 90:7 Q; T 90:8 - 90:13 R; S; F 90:14 - 90:14 Q; T 90:15 - 90:16 R; S; F	
96:18 – 111:12	96:18 - 98:17 R; HR; F; K 98:18 - 98:20 R; HR; F; K; V 98:21 - 98:21 Q; T 98:22 - 99:20 R; V 99:21 - 99:22 Q; T 99:23 - 99:24 R; V 99:25 - 100:2 R; S; F; K 100:3 - 100:4 Q; T 100:5 - 100:11 R; S; F; K 100:12 - 100:22 R; V 101:14 - 101:15 Q; T 101:24 - 102:1 F; S; K; V 102:2 - 102:3 Q; T 102:4 - 102:9 F; S; K; V 102:10 - 102:10 V 102:11 - 102:12 Q; T 102:13 - 102:14 V 102:15 - 102:17 V 102:18 - 102:18 S; V 102:19 - 102:20 Q; T 102:21 - 102:23 S; V 102:24 - 102:25 Q; T 103:1 - 103:7 V 103:8 - 103:9 Q; T 103:10 - 103:10 V 103:11 - 103:13 V; F; K; R 103:14 - 103:15 Q; T 103:16 - 103:18 V; F; K; R	141:8 - 141:12

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	103:19 - 103:19 Q; T 103:20 - 104:7 V; F; K; R 104:8 - 104:9 Q; T 104:10 - 104:11 V; F; K; R 104:12 - 105:17 R; F; S 105:18 - 105:19 Q; T 105:20 - 106:2 R 106:3 - 107:25 R; HR 108:1 - 108:3 M; V; R 108:4 - 108:5 Q; T 108:6 - 108:15 M; V; R 108:16 - 109:7 V; R; HR 109:8 - 109:9 Q; T 109:10 - 109:10 R; V 109:11 - 109:12 V; S; R; F; K 109:13 - 109:14 Q; T 109:15 - 109:16 V; S; R; F; K 109:17 - 109:17 Q; T 109:18 - 110:11 V; S; R 110:12 - 111:12 R	
115:9 – 141:3	115:9 - 115:20 F; R; K; HR 115:21 - 115:21 Q; T 115:22 - 115:23 F; R; K; HR 115:24 - 116:5 V; R 116:6 - 116:6 Q; T 116:7 - 116:15 V; R 116:16 - 116:16 Q; T 116:17 - 116:23 V; R 116:24 - 117:18 V; R 117:19 - 117:19 Q; T 117:20 - 118:11 R; V 118:12 - 118:13 Q; T 118:14 - 118:17 R; V 118:18 - 118:19 Q; T 118:20 - 118:20 R; V 118:21 - 119:1 Q; T 119:2 - 119:17 F; V; K; S 119:18 - 119:21 V; M 119:22 - 119:23 V 119:24 - 119:24 Q; T 119:25 - 121:8 V; R; F; K	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	121:9 - 121:9 Q; T	
	121:10 - 122:19 V; R; F; K; S	
	122:20 - 122:21 Q; T	
	122:22 - 123:8 V; R; F; K	
	123:9 - 123:17 F; K; R; M	
	123:18 - 123:19 V; R; F; K	
	123:20 - 123:21 Q; T	
	123:22 - 124:4 V; R; F; K;	
	124:5 - 124:6 Q; T	
	124:7 - 124:9 V; R; F; K	
	124:10 - 124:11 Q; T	
	124:12 - 125:1 V; R; F; K; H	
	125:2 - 125:3 Q; T	
	125:4 - 126:13 V; R; F; K; H	
	126:14 - 126:15 Q; T	
	126:16 - 127:5 V; R; F; K; H	
	127:6 - 127:11 V; R; F; K; M	
	127:12 - 127:13 V; R; F; K; M	
	127:14 - 127:24 Q; T	
	127:25 - 128:7 R; HR	
	128:8 - 129:14 R; HR	
	129:15 - 129:19 S; K; F	
	130:5 - 131:5 R; V; F; HR	
	131:7 - 131:25 R; V; F; HR	
	132:1 - 132:2 R; V	
	132:3 - 132:3 Q; T	
	132:4 - 132:7 R; V	
	132:8 - 133:6 R; V; F; S; K	
	133:8 - 133:11 R; V; F; S; K	
	133:13 - 133:15 R; V; F; S; K	
	133:17 - 133:19 R; V; F; S; K	
	133:23 - 134:4 R; F; A	
	134:7 - 134:19 R; F; A	
	134:20 - 135:3 R; F; S; K	
	135:4 - 135:25 R	
	136:9 - 137:3 R; V; F; S; K	
	137:4 - 137:5 Q; T	
	137:6 - 137:16 R; V; F; S; K	
	137:17 - 137:21 Q; T	
	137:22 - 138:4 R; V; F; S; K	
	138:5 - 138:22 R; F; S; K	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	138:23 - 139:3 R; F; S; K 139:4 - 139:9 R 139:10 - 139:10 Q; T 139:11 - 139:19 R 140:3 - 141:3 F; K; S	
142:13 – 23	142:13 - 142:21 F; K; S 142:22 - 142:22 Q; T 142:23 - 142:23 F; K; S	

D. TRISTAN THOMPSON

Defendants submit the below counter-designations and objections to the designations for the deposition of Tristan Thompson:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
27:18 – 29:14	27:18 - 27:21 R 27:22 - 28:9 T 28:10 - 28:25 R 29:1 - 29:10 Q; T 29:11 - 29:14 R	8:13 - 8:16
30:18 – 21	30:18 - 31:21 R; M	19:23 - 19:25
30:22 – 32:3	30:22 - 31:15 R; M 31:16 - 31:18 T 31:19 - 31:24 R 31:25 - 32:2 T 32:3 - 32:3 R	20:6 - 20:10
47:6 – 16	47:6 - 47:6 R; LC 47:7 - 47:10 T 47:11 - 47:16 R; LC	26:19 - 26:24
54:15 – 56:24	54:15 - 54:16 HR 54:17 - 54:20 T 54:21 - 54:23 T 54:24 - 55:2 T 55:3 - 55:8 S 55:9 - 55:10 T 55:11 - 55:14 S	30:8 - 30:17

Objection Legend

IO - Improper opinion
R - Irrelevant
403 - FRE 403
K - Lack of personal knowledge
S - Calls for speculation
A - Assumes facts not in evidence

LC - Calls for legal conclusion
SC - Outside scope of 30(b)(6) topics/deposition
C - Compound
M - Mischaracterizes testimony
F - Lack of foundation
HR - Hearsay

MIL - Subject of pending motion in limine
T - Not testimony
H - Improper/incomplete hypothetical
Q - Not a question
V - Vague
P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	55:15 - 55:16 T 55:17 - 55:17 S 55:19 - 55:21 LC; V; M; A 55:22 - 56:1 T 56:2 - 56:7 LC; V; M; A 56:8 - 56:16 Q; T 56:17 - 56:20 LC; V; A 56:21 - 56:22 T 56:23 - 56:24 LC; V; A	
68:11 – 69:21	69:7 - 69:14 SC; R; S 69:15 - 69:18 T 69:19 - 69:21 SC; R; S	35:7 - 35:12
70:24 – 71:24	70:24 - 71:6 F; K 71:7 - 71:8 T 71:9 - 71:24 F; K	36:2 - 36:4
75:16 – 19	75:16 - 75:19 F; K; S; H	36:9 - 36:13
111:2 – 115:8	111:2 - 111:3 R 111:4 - 111:9 Q; T 111:10 - 111:12 R 111:13 - 111:13 T 111:14 - 111:20 R 111:21 - 112:2 T 112:3 - 112:10 R; P 112:11 - 112:23 T 112:24 - 113:2 R; P; F 113:3 - 113:9 T 113:10 - 113:12 R; P; F; Q; T 113:13 - 113:18 Q; T 113:19 - 113:20 V; R 113:21 - 113:23 T 113:24 - 114:1 R 114:2 - 114:5 R; P; F 114:6 - 114:17 T 114:18 - 114:22 R; P; F; M 114:23 - 115:2 Q; T 115:3 - 115:3 R; M 115:4 - 115:6 Q; T 115:7 - 115:8 R; M	37:3 - 37:5
		43:12 - 44:5

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		44:7 - 44:10
		45:7 - 45:15
		46:23 - 47:5
		47:17 - 47:19
		47:21 - 47:23
		50:23 - 51:9
		63:6 - 64:5
		93:19 - 94:5
		95:12 - 96:19
		96:20 - 97:11
		97:16 - 97:16
		97:17 - 99:2
		99:5 - 99:5
		99:7 - 100:1
		100:4 - 100:21
		100:24 - 100:24
		101:2 - 101:18
		101:22 - 102:12
		102:15 - 102:15
		104:8 - 104:9
		104:13 - 105:14
		105:17 - 105:17
		105:19 - 106:16
		106:17 - 107:6
		107:9 - 107:9
		107:11 - 107:23
		108:1 - 108:1
		109:9 - 109:23

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

E. CORIE ZHANG

Defendants submit the below counter-designations and objections to the designations for the deposition of Corie Zhang:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
10:10 – 19		101:10 - 101:18
12:10 – 11		
13:1 – 14:15	13:1 - 14:15 R	
15:20 – 21:23	15:20 - 15:21 R; HR 15:22 - 19:3 R 19:4 - 19:4 F 19:5 - 19:6 T 19:7 - 19:10 F 20:11 - 21:23 R	
24:6 – 38:3	24:6 - 25:8 R 25:9 - 25:10 T 25:11 - 25:15 R 25:16 - 25:20 T 25:21 - 26:5 R 26:6 - 26:9 T 26:10 - 26:15 R; LC 26:16 - 26:16 T 26:17 - 26:20 R; LC 26:21 - 26:21 T 26:22 - 26:23 R; LC 26:24 - 27:21 Q; T 27:22 - 28:5 R; LC 28:6 - 28:7 T 28:8 - 28:9 R; LC 28:11 - 28:12 LC; F 28:13 - 28:14 T 28:15 - 29:4 R; LC 29:5 - 30:5 R; HR 30:6 - 30:7 R; V 30:8 - 30:8 T 30:9 - 30:25 R 31:1 - 31:1 F 31:2 - 31:2 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	31:3 - 31:7 F 31:8 - 31:10 V; M 31:11 - 31:11 T 31:24 - 31:25 F 32:1 - 32:1 T 32:2 - 33:19 F; K 33:20 - 33:23 A; R 33:24 - 33:24 T 33:25 - 35:18 A; R; M 35:19 - 35:21 V; A; C 35:22 - 35:22 T 35:23 - 35:25 V; A; C 36:1 - 37:14 F; K; S; R 37:15 - 37:16 F; S 37:17 - 37:17 T 37:18 - 37:21 F; S 37:22 - 38:3 F; K; S	
41:2 – 51:4	41:2 - 41:3 V; F; K; S 41:4 - 41:4 T 41:5 - 41:11 V; F; K; S 41:12 - 41:12 T 41:13 - 41:14 V; F; K; S 41:15 - 41:18 F; K 41:19 - 42:22 F; K; S; R 42:23 - 42:23 T 42:24 - 43:1 V; F; K; S 43:2 - 43:5 M; C 43:6 - 43:6 T 43:7 - 43:13 F 43:14 - 43:15 T 43:16 - 44:21 R; F; K 44:22 - 44:23 F; K; S; H 44:24 - 45:1 T 45:2 - 45:2 F; K; S; H 45:3 - 45:3 T 45:4 - 45:10 F; K; S; H 45:11 - 45:12 F; K; S; H; V; A 45:13 - 45:13 T 45:14 - 46:20 F; K; S; H 46:21 - 46:21 F; K	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	46:22 - 46:22 T 46:23 - 47:20 F; K; H 47:21 - 49:7 R; F; K; S 49:8 - 49:14 R; F; K; H 49:15 - 49:15 T 49:16 - 49:19 R; F; K; H 49:20 - 49:24 F; K; S; H 49:25 - 50:1 T 50:2 - 50:9 F; K; S; H 50:10 - 50:12 F; K; S; H 50:13 - 50:13 T 50:14 - 50:16 F; K; S; H 50:17 - 50:19 F; K; S; H; V 50:20 - 50:20 T 50:21 - 51:4 F; K; S; H; V	
51:11-61:21	51:11 - 51:18 R; 403; F; K 51:19 - 54:24 R; F; K 54:25 - 55:2 F; K; S 55:3 - 55:3 T 55:4 - 55:11 R 55:12 - 55:14 R 55:15 - 55:15 T 55:16 - 55:25 R 56:1 - 56:5 F; K; S 56:6 - 56:6 T 56:7 - 56:12 F; K; S 56:13 - 56:14 F; K; H 56:15 - 56:15 T 56:16 - 57:14 F; K; H 57:15 - 57:15 T 57:16 - 57:24 F; K; H 57:25 - 57:25 T 58:1 - 58:4 F; K; H 58:5 - 58:9 M; V; K 58:10 - 58:10 T 58:11 - 58:25 F; K; M; V 59:1 - 59:7 F 59:8 - 60:6 R 60:7 - 60:11 F; K; S 60:12 - 60:12 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	60:13 - 61:21 R; F; K; S	
62:12-15	62:12 - 62:15 F; K; S; H	
63:4 – 70:9	63:4 - 63:8 F; K; HR; R 63:9 - 63:13 T 63:14 - 68:16 F; K; S; H; HR 68:17 - 68:21 F; K; S; H; HR 68:22 - 68:22 T 68:23 - 69:22 F; K; S; H; HR 69:23 - 69:24 F; K; S; H 69:25 - 69:25 T 70:1 - 70:9 F; K; S; R	
71:8 – 75:8	71:8 - 71:9 F; K; HR; R 71:10 - 75:8 F; K; S; H; HR	
77:22 – 83:4	77:22 - 77:23 R; HR 77:24 - 81:12 F; K; S; HR; H 81:13 - 81:13 T 81:14 - 82:12 F; K; S; H 82:13 - 82:18 R; HR 82:19 - 83:4 R; HR	
86:12 – 93:17	86:12 - 86:16 R; HR 86:17 - 87:10 R; F; K; V 87:11 - 87:11 T 87:12 - 88:2 R; F; K; V 88:3 - 88:3 T 88:4 - 89:15 R; F; K; V; S 89:16 - 89:16 T 89:17 - 90:10 R; F; K; V; HR 90:11 - 90:12 R; HR 90:13 - 90:25 R; F; K; H 91:1 - 91:1 T 91:2 - 93:13 R; F; K; S 93:14 - 93:14 T 93:15 - 93:17 R; F; K; S	
94:13 – 97:3	94:13 - 95:3 HR 95:4 - 95:5 F; K; S 95:6 - 95:10 F; K; S 95:11 - 95:11 T 95:12 - 95:17 F; K; S 95:18 - 95:18 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	95:19 - 96:11 F; K; S 96:12 - 96:12 T 96:13 - 97:3 F; K; S	
99:22-100:13	99:22 - 99:24 F; K; S; LC 99:25 - 100:12 T 100:13 - 100:13 F; K; S; LC	
101:19-117:1	102:7 - 102:7 T 102:10 - 102:14 F; K; S; P 102:15 - 102:24 T 102:25 - 104:20 T; Q 104:21 - 106:11 R; F; K; S; 403 106:12 - 106:12 T 106:13 - 106:18 R; F; K; S; 403; LC 106:19 - 106:21 T 106:22 - 107:1 R; F; K; S; 403 107:2 - 107:10 Q; T 107:11 - 108:5 R; F; K; S; 403; LC 108:6 - 108:6 T 108:7 - 109:23 R; F; K; S; 403 109:24 - 110:1 T 110:2 - 110:22 R; F; K; S; 403 110:23 - 111:15 T 111:16 - 112:5 R; 403 112:6 - 112:16 T 112:17 - 113:1 R; F; K; S; 403 113:2 - 113:8 T 113:9 - 113:11 R; F; K; S; 403; m 113:12 - 113:13 t 113:14 - 113:20 R; F; K; S; 403 113:21 - 113:21 R; F; K; S; 403; p 113:22 - 114:1 T 114:2 - 114:5 R; F; K; S; 403; P; LC 114:6 - 114:20 T 114:21 - 115:1 R; F; K; S; 403 115:2 - 115:4 R; F; K; S; 403; M 115:5 - 115:5 T 115:6 - 115:11 R; F; K; S; 403; HR 115:12 - 115:12 T 115:13 - 115:17 R; F; K; S; 403; HR 115:18 - 115:19 F; K; R	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	115:20 - 117:1 F; K; R; S	
120:12 – 122:2	120:12 - 121:11 R; F; K; S; HR 121:12 - 121:12 T 121:13 - 121:16 R; F; K; S; V 121:17 - 121:17 T 121:18 - 122:2 R; F; K; S	
123:23-132:1	123:23 - 125:3 R; V; F; K 125:4 - 125:4 T 125:5 - 126:1 R; V; F; K 126:2 - 126:2 T 126:3 - 126:11 R; V; F; K 126:12 - 126:12 T 126:13 - 126:25 R; F; K; M 127:1 - 127:2 T 127:3 - 127:9 R; F; K; LC 127:10 - 127:10 T 127:11 - 127:18 R; F; K; S 127:19 - 127:19 T 127:20 - 128:2 R; F; K; S 128:3 - 128:3 T 128:4 - 128:17 R; F; K; S 128:18 - 128:18 T 128:19 - 129:2 R; F; K; S 129:3 - 129:3 T 129:4 - 129:16 R; F; K; S 129:17 - 129:17 T 129:18 - 130:14 R; F; K; S 130:15 - 132:1 T	
137:3 – 141:10	137:3 - 138:18 R; F; K; 403 138:19 - 138:19 T 138:20 - 139:7 R; F; K; 403; S 139:8 - 139:8 T 139:9 - 139:21 R; F; K; 403; S; H 139:22 - 139:22 T 139:23 - 140:4 R; F; K; 403; S; H 140:5 - 140:5 T 140:6 - 140:14 R; F; K; H 140:15 - 140:15 T 140:16 - 140:25 R; F; K; 403; LC	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	141:1 - 141:1 T 141:2 - 141:5 R; F; K; 403; S; H 141:6 - 141:6 T 141:7 - 141:10 R; F; K; 403; S; H	
142:16 – 150:7	142:16 - 142:18 R; F; K 142:19 - 143:9 R; F; K; 403; S 143:10 - 143:10 T 143:11 - 143:23 R; F; K; 403; S; P 143:24 - 143:24 T 143:25 - 144:2 R; F; K; 403; S; P 144:3 - 144:3 T 144:4 - 144:14 R; F; K; 403; LC; P 144:15 - 144:15 T 144:16 - 145:12 R; F; K; 403; S; P 145:13 - 145:13 T 145:14 - 145:20 R; F; K; 403; S 145:21 - 145:21 T 145:22 - 146:6 R; F; K; 403; S; P 146:7 - 146:7 R; HR 146:8 - 148:4 R; HR; F 148:5 - 148:5 T 148:6 - 149:20 R; F; K; HR 149:21 - 149:21 F; K 149:22 - 150:4 F; K; S 150:5 - 150:5 F 150:6 - 150:7 F; K; S	
162:2 – 164:5	162:2 - 162:10 F; K; S 162:11 - 163:9 Q; T 163:10 - 164:5 R; F; K	
165:12 – 167:19	165:12 - 165:12 F; K; HR 165:13 - 165:15 F; K; S 165:16 - 165:16 T 165:17 - 165:21 F; K; S 165:22 - 165:22 T 165:23 - 166:6 F; K; S 166:7 - 166:7 T 166:8 - 166:21 F; K; S 166:22 - 166:23 F; K; HR 166:24 - 167:19 F; K; S	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

F. WINNIE HSIEH

Defendants submit the below counter-designations and objections to the designations for the deposition of Winnie Hsieh:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
6:24 – 7:6	6:24 - 7:6 R	68:19 - 69:1
8:20 – 10:3	8:20 - 10:3 R	69:23 - 70:2
12:6 – 13:20	12:20 - 12:21 V; M 12:22 - 12:22 T 12:23 - 13:5 Q; T 13:6 - 13:20 R	70:4 - 70:9
15:24-18:7		81:15 - 81:22
20:8 – 21:16	20:8 - 21:11 S 21:12 - 21:12 T 21:13 - 21:16 S	91:7 - 92:1
24:2 – 36:6	24:2 - 24:3 V; Q 24:4 - 24:4 T 24:5 - 25:7 F; K; S; H 25:8 - 25:8 T 25:9 - 25:23 F; K; S; H 25:24 - 26:11 T 26:12 - 26:22 F; K; S; H; V 26:23 - 26:23 T 26:24 - 27:5 F; K; S; H; V 27:6 - 27:6 F; K; S; HR 27:7 - 27:20 Q; T 27:21 - 31:19 F; K; S 31:20 - 31:20 T 31:21 - 32:12 F; K; S 32:13 - 32:13 T 32:14 - 33:1 F; K; S; M 33:2 - 33:2 T 33:3 - 35:2 F; K; S 35:3 - 35:3 T 35:4 - 35:8 F; K; S; M 35:9 - 35:9 T 35:10 - 35:16 F; K; S; M 35:17 - 35:20 F; K; S 35:21 - 35:21 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	35:22 - 36:6 F; K; S	
38:8 – 49:19	38:8 - 39:5 F; K; S; M 39:6 - 39:6 T 39:7 - 40:13 F; K; S 40:14 - 40:15 T 40:16 - 40:16 F; K; S 40:17 - 40:17 T 40:18 - 40:20 F; K; S 40:21 - 40:25 H 41:1 - 41:16 F; K; S 41:17 - 41:17 T 41:18 - 41:23 F; K; S 41:24 - 41:24 T 41:25 - 42:14 F; K; S 42:15 - 42:15 T 42:16 - 42:21 F; K; S 42:22 - 42:22 T 42:23 - 43:23 F; K; S 43:24 - 43:24 T 43:25 - 45:14 F; K; S 45:15 - 45:15 T 45:16 - 46:20 F; K; S 46:21 - 46:22 T 46:23 - 47:23 F; K; S 47:24 - 47:24 T 47:25 - 48:14 F; K; S 48:15 - 48:15 T 48:16 - 49:10 F; K; S 49:11 - 49:11 T 49:12 - 49:19 F; K; S; R	
53:14 – 61:3	53:14 - 53:23 F; K; S 53:24 - 53:24 T 53:25 - 54:25 F; K; S; V 55:1 - 55:2 T 55:3 - 55:21 F; K; S 55:22 - 55:22 F; K; S 55:23 - 56:5 F; K; S 56:6 - 56:6 T 56:7 - 56:17 F; K; S 56:18 - 56:18 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	56:19 - 56:25 F; K; S; H 57:1 - 57:1 T 57:2 - 57:17 F; K; S 57:18 - 57:19 T 57:20 - 58:2 F; K; S 58:3 - 58:3 T 58:4 - 58:10 F; K; S 58:11 - 58:11 T 58:12 - 58:19 F; K; S; H 58:20 - 58:23 Q; T 58:24 - 59:16 R; V 59:17 - 59:17 T 59:18 - 61:3 F; K; S; R	
63:11 – 66:2	63:11 - 63:15 F; K; S 63:16 - 65:7 F; K; S 65:8 - 65:8 T 65:9 - 66:2 F; K; S	
69:2-21	69:2 - 69:18 R 69:19 - 69:19 T 69:20 - 69:21 R	
73:19 – 74:21	73:22 - 73:24 F 73:25 - 73:25 T 74:1 - 74:11 F; V 74:12 - 74:12 T 74:13 - 74:21 F; V	
81:7-14	81:7 - 81:14 R	
85:4 – 89:25	85:4 - 85:11 R; HR 85:12 - 85:15 T 85:16 - 87:25 F; K; S; HR 88:1 - 88:1 T 88:2 - 89:18 F; K; S 89:19 - 89:19 T 89:20 - 89:25 F; K; S	

G. LEBRON JAMES

Defendants submit the below counter-designations and objections to the designations for the deposition of LeBron James:

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
19:20-25		10:3 - 10:6
56:23-58:20	58:17 - 58:20 IO; S; F; LC	18:1 - 18:3
62:7-13		18:6 - 18:9
66:10-67:11	66:10 - 66:10 V 66:11 - 66:11 Q; T 66:12 - 66:12 V 67:4 - 67:11 V	18:22 - 18:24
73:24-74:2		19:10 - 19:19
76:10-16	76:14 - 76:15 Q; T	20:7 - 20:8
80:19-81:1	80:19 - 80:21 F; S; IO; LC 80:22 - 80:24 Q; T 80:25 - 81:1 F; S; IO; LC	22:14 - 22:16
94:25-95:3	94:25-95:3 V	23:25 - 24:7
		29:22 - 30:3
		30:5 - 30:9
		32:22 - 33:7
		33:8 - 34:3
		34:12 - 34:23
		39:1 - 39:9
		40:14 - 40:19
		45:5 - 45:24
		45:25 - 46:12
		48:10 - 48:12
		48:15 - 48:16
		48:18 - 48:21
		48:22 - 49:8
		49:16 - 49:23
		50:2 - 50:9
		50:16 - 51:3
		51:8 - 51:23
		55:8 - 55:10
		55:12 - 55:12
		55:14 - 55:19
		66:14 - 67:3

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		73:20 - 73:23
		74:9 - 74:14
		75:11 - 76:5
		76:7 - 76:13
		76:16 - 76:21
		76:23 - 76:24
		77:2 - 77:10
		77:15 - 77:18
		77:20 - 77:25
		78:5 - 78:5
		78:7 - 78:9
		78:10 - 78:23
		79:10 - 79:12
		79:16 - 79:18
		79:20 - 79:25
		81:5 - 81:19
		81:22 - 81:22
		103:20 - 104:1
		104:2 - 104:3
		104:6 - 104:8
		106:11 - 106:16
		107:2 - 107:14
		108:7 - 108:16
		108:19 - 109:4
		109:6 - 109:9
		109:10 - 109:14
		109:16 - 109:19
		109:20 - 110:23
		110:25 - 111:13
		111:15 - 111:18
		111:21 - 112:11
		112:12 - 112:16
		112:19 - 112:19

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		112:21 - 113:6
		113:9 - 113:12
		113:14 - 114:1
		114:4 - 114:4
		114:6 - 114:13
		114:15 - 114:18
		114:21 - 115:2
		115:5 - 115:5
		115:7 - 115:13
		115:15 - 115:15
		115:17 - 115:17
		115:19 - 115:19
		115:21 - 116:7
		116:9 - 116:9
		116:11 - 116:21
		116:23 - 116:23
		116:25 - 116:25
		117:2 - 117:2
		117:4 - 117:9
		117:11 - 117:11
		117:13 - 117:14
		117:17 - 118:10
		118:14 - 118:21
		118:22 - 119:4
		119:8 - 119:11
		119:13 - 120:1
		120:3 - 120:3
		120:5 - 120:5
		120:7 - 120:7
		120:9 - 120:11
		120:14 - 120:15
		120:17 - 120:25
		121:2 - 121:2

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		121:4 - 121:4
		121:6 - 121:6
		121:8 - 121:18
		121:20 - 121:20
		121:22 - 121:23
		122:2 - 122:9
		122:11 - 122:11
		122:13 - 122:13
		122:15 - 122:15
		122:17 - 122:19
		122:22 - 122:22
		122:25 - 123:6
		123:8 - 123:13
		123:15 - 123:15
		123:17 - 123:17
		123:19 - 123:19
		123:21 - 123:23
		124:15 - 124:20
		124:22 - 124:22
		124:24 - 124:25
		125:3 - 125:11
		125:13 - 125:13
		125:15 - 125:15
		125:17 - 125:17
		125:19 - 126:9
		126:12 - 126:14
		126:17 - 127:7
		127:11 - 127:13
		127:15 - 127:23
		127:25 - 127:25
		128:2 - 128:2
		128:4 - 128:4
		128:6 - 128:14

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

H. DANNY GREEN

Defendants submit the below counter-designations and objections to the designations for the deposition of Danny Green:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
9:23-10:25	9:23 - 9:25 R; 403; H 10:1 - 10:9 R; 403; T 10:10 - 10:16 R; 403; H 10:17 - 10:19 R; 403; T 10:20 - 10:25 R; 403; H	7:6 - 7:11
24:12-26:7	24:12 - 24:16 R 403; SC 24:17 - 24:19 R 403; SC; F; K; S 24:20 - 24:21 T 24:22 - 25:2 R 403; SC; F; K; S 25:3 - 25:4 T 25:5 - 25:8 R 403; SC; F; K; S 25:9 - 25:11 T 25:12 - 25:20 R 403; SC; F; K; S 25:21 - 25:22 T 25:23 - 26:4 R 403; SC; F; K; S 26:5 - 26:6 T 26:7 R 403; SC; F; K; S	22:3 - 22:5
26:8-27:13	26:8 - 27:13 R 403; SC; F; K; S	22:18 - 22:20
26:20-27:13	26:20 - 27:13 R 403; SC; F; K; S	22:23 - 22:25
30:7-31:17	30:7 - 30:16 R; 403; C 30:17 - 30:19 V; F; K; S 30:20 - 30:21 T 30:22 - 31:1 V; F; K; S 31:2 - 31:3 T 31:4 - 31:13 V; F; K; S 31:14 - 31:16 T 31:17 - 31:17 V; F; K; S	23:4 - 23:12
32:24-33:7	32:24 - 33:3 M; H; Q 33:4 - 33:7 R; 403	33:21 - 33:25
34:17-35:15	34:21 - 34:24 Q; T	34:2 - 34:10
38:13-39:20	38:13 - 38:19 F; K; S 38:20 - 38:23 V; F; K; HR 38:24 - 38:25 T	34:12 - 34:16

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	39:1 - 39:20 V; F; K; HR	
52:17-55:4	52:17 - 53:7 F; K; S; SC 53:8 - 53:9 F; K; S; HR; SC 53:10 - 53:11 T 53:12 - 54:20 F; K; S; HR; R; 403; SC 54:21 - 55:4 F; K; S; SC	35:16 - 35:20
60:13-62:6	60:13 - 60:24 R; 403 60:25 - 61:3 R; 403; C 61:4 - 61:5 T 61:6 - 61:7 R; 403; C 61:8 - 61:13 R; 403; A; V 61:14 - 61:17 T 61:18 - 61:20 R; 403; A; V 61:21 - 61:23 T 61:24 - 62:2 R; 403 62:3 - 62:5 T 62:6 - 62:6 R; 403	51:18 - 51:24
81:3-10	81:3 - 81:10 R	52:3 - 52:16
87:16-90:3	87:16 - 89:23 R; 403; F; K; S 89:24 - 90:1 T 90:2 - 90:3 R; 403; F; K; S	57:16 - 57:18
95:22-97:25	95:22 - 96:5 V; C; A 96:6 - 96:7 T 96:8 - 96:12 V; C; A 96:13 - 96:18 R; 403 96:19 - 96:22 V; M 96:23 - 97:1 T 97:2 - 97:25 R; 403	58:15 - 58:24
125:13-127:6	125:13 - 125:23 R; 403; HR; SC 126:8 - 126:9 V; A; F; K; SC 126:10 - 126:12 T 126:13 - 126:23 V; A; F; K; SC	62:7 - 62:10
127:10-129:16	127:10 - 127:20 R; 403; HR; SC 127:21 - 127:22 R; 403; HR; SC 127:23 - 128:2 T 128:3 - 128:6 R; 403; SC; LC 128:7 - 128:10 T 128:11 - 128:15 R; 403; SC; LC 128:16 - 129:8 R; 403; SC; HR	65:11 - 65:13

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	129:9 - 129:10 R; 403; SC; LC 129:11 - 129:15 T 129:16 - 129:16 R; 403; SC; LC	
		76:19 - 76:25
		77:2 - 77:15
		81:11 - 81:13
		82:11 - 82:17
		83:14 - 83:24
		95:14 - 95:16
		95:18 - 95:21
		98:2 - 98:5
		108:2 - 108:7
		108:10 - 108:25
		109:2 - 109:3
		125:24 - 126:7
		126:24 - 127:6
		132:8 - 132:12
		132:18 - 132:20
		133:2 - 133:2
		133:3 - 133:4
		133:10 - 133:10
		133:11 - 133:14
		133:20 - 133:25
		134:2 - 134:6
		134:7 - 134:12
		134:18 - 134:25
		135:2 - 135:2
		135:8 - 135:9
		135:18 - 135:19
		136:7 - 136:21
		136:22 - 136:22
		137:5 - 137:18

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		138:6 - 138:9
		138:12 - 138:18
		138:21 - 138:21
		139:17 - 139:25
		140:2 - 140:9
		140:12 - 140:21
		141:3 - 141:5
		141:8 - 141:15
		141:18 - 141:18
		141:21 - 141:25
		142:2 - 142:19
		142:20 - 142:25
		143:2 - 143:9
		143:12 - 143:13
		143:16 - 143:25
		144:2 - 144:5
		144:7 - 144:8
		144:10 - 144:10
		144:13 - 144:25
		145:2 - 145:8
		145:11 - 145:11
		145:12 - 145:25
		146:2 - 146:2
		146:5 - 146:7
		146:10 - 146:10
		146:11 - 146:25
		147:2 - 147:14
		147:15 - 147:25
		148:2 - 148:5
		148:8 - 148:9
		148:12 - 148:16
		148:19 - 148:19

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		148:25 - 148:25
		149:2 - 149:3
		149:6 - 149:7
		149:8 - 149:25
		150:2 - 150:6
		150:7 - 150:20
		150:23 - 150:25
		151:4 - 151:10
		151:13 - 151:17
		151:20 - 151:23
		151:24 - 151:25
		152:2 - 152:2
		152:5 - 152:5
		152:6 - 152:14
		152:17 - 152:20
		152:23 - 152:25
		153:2 - 153:5
		153:8 - 153:18
		153:21 - 153:25
		154:2 - 154:9
		154:12 - 154:20
		155:2 - 155:13
		155:16 - 155:18
		155:21 - 155:25
		156:2 - 156:4
		156:15 - 156:24
		157:3 - 157:4
		157:7 - 157:13
		157:16 - 157:17
		157:20 - 157:20
		157:21 - 157:25
		158:7 - 158:7

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		158:8 - 158:20
		158:23 - 158:25
		159:4 - 159:4
		159:10 - 159:16
		159:20 - 159:25
		160:2 - 160:10
		160:13 - 160:16
		160:17 - 160:20
		160:23 - 160:25
		161:2 - 161:12
		161:15 - 161:17
		161:20 - 161:25
		162:2 - 162:5
		162:7 - 162:8
		162:11 - 162:19
		162:22 - 162:23
		163:2 - 163:14
		163:17 - 163:19
		163:22 - 163:25
		164:2 - 164:11
		164:20 - 164:25
		165:2 - 165:7
		165:9 - 165:11
		165:13 - 166:13
		166:16 - 166:22
		166:25 - 166:25
		167:2 - 167:15
		167:18 - 167:19
		167:22 - 167:22
		167:23 - 167:25
		168:2 - 168:15
		168:16 - 168:25

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		169:2 - 169:7
		169:10 - 169:12
		169:16 - 169:19
		169:23 - 169:23
		169:24 - 169:25
		170:2 - 170:2
		170:6 - 170:19
		170:20 - 170:24
		171:3 - 171:17
		171:20 - 171:22
		171:25 - 171:25
		172:2 - 172:13
		172:16 - 172:16
		172:19 - 172:19
		173:6 - 173:17
		173:20 - 173:21
		173:24 - 173:25
		174:2 - 174:4
		174:7 - 174:7
		174:8 - 174:11
		174:14 - 174:14
		174:18 - 174:20
		174:23 - 174:23
		175:6 - 175:14
		175:17 - 175:17
		176:14 - 176:21
		176:23 - 176:24
		177:3 - 177:7
		177:10 - 177:13
		177:16 - 177:21
		177:25 - 177:25
		178:2 - 178:7

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
		178:20 - 178:20
		191:11 - 191:22
		192:4 - 192:10
		192:11 - 192:14
		192:22 - 192:25
		193:2 - 193:25
		194:4 - 194:9

I. JOEL FRIESCH

Defendants submit the below counter-designations and objections to the designations for the deposition of Joel Friesch:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
7:4-8:24	7:20 - 8:13 R; T 8:24 - 8:24 Q	28:9 - 28:11
23:14 – 27:22	24:7 - 24:13 V 24:12 - 24:12 Q 24:17 - 24:18 Q 25:3 - 25:3 Q 25:17 - 25:21 Q 26:12 - 26:13 Q 26:25 - 26:25 Q 27:7 - 27:7 Q 27:21 - 27:22 Q	28:13 - 28:21
28:22 – 36:22	28:24 - 28:24 Q 29:5 - 29:5 Q 29:9 - 29:21 F; S; K 29:10 - 29:10 Q 29:22 - 30:14 M; S; F; K 29:24 - 29:25 Q 30:6 - 30:7 Q 30:25 - 30:25 Q 31:22 - 31:22 Q	46:21 - 46:24

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	32:21 - 33:3 F; S; K 33:5 - 33:5 Q 33:12 - 33:12 Q 34:6 - 34:6 Q 34:21 - 34:21 Q 35:2 - 35:2 Q 36:16 - 36:22 F; R	
37:3-46:7	37:3 - 37:12 F; S 37:5 - 37:5 Q 37:15 - 37:17 Q 38:8 - 38:8 Q 38:16 - 38:22 V 38:18 - 38:18 Q 39:14 - 39:14 Q 39:18 - 39:18 Q 39:20 - 39:20 Q 39:25 - 39:25 Q 40:5 - 40:5 Q 40:18 - 40:24 V; M 40:21 - 40:22 Q 41:10 - 41:11 Q 42:5 - 42:9 V 42:7 - 42:7 Q 42:12 - 42:12 Q 42:20 - 42:24 HR; V 42:22 - 42:23 Q 43:5 - 43:5 Q 43:11 - 43:12 Q 43:19 - 44:1 HR; M; V 43:21 - 43:22 Q 44:5 - 44:6 Q 44:14 - 44:14 Q 44:24 - 44:24 Q 45:3 - 45:3 Q 45:10 - 45:12 Q 45:13 - 45:17 S; F; K 45:15 - 45:16 Q 45:21 - 45:21 Q 45:25 - 45:25 Q 46:5 - 46:6 Q	47:1 - 47:2

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations		Defendants' Counter Designations
47:4-48:18	47:6 - 47:6 47:9 - 47:12 47:19 - 48:18 47:22 - 47:22 48:4 - 48:4 48:16 - 48:16	Q V V Q Q Q	58:21 - 58:25
49:21 – 52:16	49:21 - 50:4 50:10 - 50:13 50:15 - 50:15 50:20 - 50:20 51:1 - 51:11 51:12 - 51:16 51:14 - 51:14 51:15 - 51:15 51:19 - 51:19 51:25 - 51:25 52:15 - 52:16	Q; T Q Q Q R S; K; F Q Q Q Q Q	103:2 - 103:6
54:6 – 56:21	55:18 - 56:21 55:20 - 55:20 56:1 - 56:1 56:3 - 56:4 56:16 - 56:17	R; 403; F: V Q Q Q Q	104:12 - 104:14
58:13-16			
59:5 – 77:24	59:5 - 61:18 59:11 - 59:11 59:15 - 59:15 59:19 - 59:20 60:16 - 60:16 60:22 - 60:23 60:24 - 60:25 61:4 - 61:4 61:16 - 61:16 61:24 - 61:25 63:11 - 63:18 63:13 - 63:13 64:24 - 64:24 65:8 - 65:8 66:6 - 66:8 69:11 - 69:11 69:20 - 69:20	R; 403 Q Q Q Q T Q Q Q Q S; F; K Q Q Q Q Q Q	104:16 - 104:17

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations		Defendants' Counter Designations
	69:24 - 70:6	F; K; S	
	70:1 - 70:1	Q	
	70:23 - 70:24	Q	
	71:21 - 71:22	Q	
	72:8 - 72:13	F; K; S	
	72:10 - 72:10	Q	
	72:24 - 72:24	Q	
	73:5 - 73:5	Q	
	73:22 - 77:16	M; V; 403	
	73:24 - 73:24	Q	
	74:3 - 74:3	Q	
	74:6 - 74:11	V; F; S; K	
	74:9 - 74:10	Q	
	74:15 - 74:15	Q	
	75:3 - 75:3	Q	
	75:16 - 75:16	Q	
	75:17 - 75:22	Q	
	76:6 - 76:6	Q	
	76:19 - 76:19	Q	
	77:4 - 77:4	Q	
	77:14 - 77:14	Q	
87:23 – 95:10	87:23 - 88:16	K; S; F	118:14 - 118:16
	88:1 - 88:14	Q	
	88:20 - 89:3	Q	
	89:11 - 89:16	Q	
	90:3 - 90:21	Q	
	90:23 - 90:25	V; S; K; F	
	91:1 - 91:18	Q	
	91:19 - 91:22	V; S; F; K	
	91:24 - 92:13	Q	
	92:21 - 92:23	Q	
	92:24 - 93:16	Q; T	
	94:4 - 94:6	Q	
	94:11 - 94:12	V; S; K; F; LC	
	94:13 - 94:24	Q; T	
	94:25 - 95:5	V; S; K; F; LC	
107:5 – 21	107:5 - 107:13	V; S; F; K; LC	118:18 - 118:18
	107:8 - 107:8	Q	
	107:11 - 107:11	Q	
	107:18 - 107:21	V; S; F; K; LC	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	107:19 - 107:19 Q	
108:2 – 118:12	108:2 - 114:16 R; 403 109:12 - 109:12 Q 110:10 - 110:10 T 110:11 - 110:11 Q 110:12 - 110:17 Q; T 111:15 - 111:15 Q 112:9 - 112:14 S; K; F; V 112:11 - 112:11 Q 113:9 - 113:9 Q 114:18 - 115:14 Q; T 115:15 - 115:20 V; S; K; F 115:17 - 115:17 Q 115:22 - 115:25 H; V; S; F; K 115:24 - 115:24 Q 116:1 - 116:1 Q 116:8 - 118:12 MIL; R; 403 116:20 - 116:20 Q 117:6 - 117:10 V 117:8 - 117:8 Q 117:20 - 118:4 S; K; F; V 117:22 - 117:22 Q 118:8 - 118:8 Q	126:8 - 126:9
119:16 – 122:2	120:1 - 120:19 V; S; F; K 120:2 - 120:2 Q; T 121:2 - 121:3 Q; T 121:15 - 121:15 Q; T 121:23 - 121:24 Q; T	126:11 - 126:17
123:21-125:20	123:21 - 123:24 V 123:22 - 123:22 Q; T 124:10 - 124:10 Q 124:16 - 124:16 Q; T 124:21 - 124:22 Q; T 125:7 - 125:7 Q; T	126:19 - 127:1
127:8-19	127:11 - 127:12 Q; T	
128:18-129:3		

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

J. JEFF THOMAS

Defendants submit the below counter-designations and objections to the designations for the deposition of Jeff Thomas:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations		Defendants' Counter Designations
14:10 – 15:24	15:1 - 15:13 15:19 - 15:24	Q; T Q; T	92:15 - 92:16
16:14-26:23	16:23 - 17:4 17:24 - 18:1 18:2 - 18:11 18:15 - 19:14 19:15 - 19:19 22:22 - 24:19 23:2 - 23:4 23:21 - 23:22 24:4 - 24:5 24:14 - 24:15 24:22 - 24:25 25:10 - 25:21 25:22 - 26:5 26:1 - 26:4 26:7 - 26:18 26:12 - 26:16	Q; T Q; T Q; T Q; T Q; T R; SC Q; T Q; T Q; T Q; T Q; T Q; T LC; SC Q; T LC; SC Q; T	92:19 - 92:23
26:24-28:13	28:2 - 28:13	SC	158:3 - 158:5
28:24 – 79:6	28:24 - 29:15 29:3 - 29:3 29:13 - 30:1 30:2 - 30:9 30:7 - 30:7 30:10 - 31:13 30:18 - 30:19 30:23 - 30:23 31:8 - 31:10 31:14 - 32:25 31:21 - 31:22 32:8 - 32:9 33:1 - 33:2 33:3 - 33:24 33:7 - 33:7	SC Q; T Q; T SC Q; T SC Q; T Q; T Q; T SC Q; T Q; T SC SC SC Q; T	158:9 - 158:9

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	33:13 - 33:14 Q; T	
	33:21 - 33:22 Q; T	
	34:2 - 34:24 SC	
	34:3 - 34:3 Q; T	
	34:10 - 34:11 Q; T	
	34:17 - 34:19 Q; T	
	35:1 - 35:25 SC	
	35:9 - 35:10 Q; T	
	35:14 - 35:14 Q; T	
	35:18 - 35:20 Q; T	
	35:25 - 35:25 Q; T	
	36:12 - 36:15 Q; T	
	37:12 - 37:19 Q; T	
	38:7 - 38:8 Q; T	
	38:13 - 38:14 Q; T	
	39:3 - 39:20 Q; T	
	39:23 - 39:23 Q; T	
	40:7 - 40:8 Q; T	
	41:7 - 41:11 Q; T	
	42:13 - 42:13 Q; T	
	42:14 - 42:16 Q; T	
	42:20 - 42:21 T	
	42:22 - 43:1 Q; T	
	43:2 - 43:15 Q; T	
	43:16 - 43:22 Q; T	
	43:23 - 44:18 Q; T	
	45:3 - 45:5 Q; T	
	45:12 - 45:21 Q; T	
	46:8 - 46:19 Q; T	
	46:24 - 47:19 Q; T	
	48:2 - 48:6 Q; T	
	48:12 - 48:12 Q; T	
	48:14 - 49:3 SC; LC	
	48:15 - 48:15 Q; T	
	48:18 - 48:22 Q; T	
	49:1 - 49:2 Q; T	
	49:5 - 50:4 SC	
	49:8 - 49:9 Q; T	
	49:18 - 49:18 Q; T	
	49:24 - 50:3 Q; T	
	50:23 - 50:24 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	51:3 - 51:4 Q; T	
	51:10 - 51:11 Q; T	
	51:16 - 51:18 Q; T	
	51:22 - 51:23 Q; T	
	52:10 - 53:1 Q; T	
	53:2 - 54:13 SC	
	53:12 - 53:13 Q; T	
	53:22 - 53:23 Q; T	
	54:3 - 54:5 Q; T	
	54:9 - 54:11 Q; T	
	54:15 - 55:25 SC	
	54:18 - 54:20 Q; T	
	55:2 - 55:4 Q; T	
	55:10 - 55:11 Q; T	
	55:16 - 55:17 Q; T	
	55:22 - 55:24 Q; T	
	56:21 - 56:21 T	
	56:22 - 58:9 Q; T	
	58:19 - 60:4 SC	
	58:22 - 58:25 Q; T	
	59:3 - 59:6 Q; T	
	59:15 - 59:16 Q; T	
	59:21 - 60:3 Q; T	
	60:6 - 60:12 LC; SC	
	60:10 - 60:11 Q; T	
	60:12 - 60:22 Q; T	
	60:23 - 61:9 SC	
	61:7 - 61:8 Q; T	
	61:13 - 61:14 Q; T	
	61:18 - 61:19 Q; T	
	61:22 - 62:25 SC; LC	
	61:24 - 61:25 Q; T	
	62:7 - 62:9 Q; T	
	62:18 - 62:21 Q; T	
	63:2 - 63:8 SC	
	63:5 - 63:7 Q; T	
	63:10 - 63:14 Q; T	
	63:16 - 63:23 Q; T	
	64:8 - 64:9 Q; T	
	64:16 - 64:17 Q; T	
	64:22 - 64:23 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	65:3 - 65:4 Q; T	
	65:11 - 65:12 Q; T	
	65:19 - 65:20 Q; T	
	65:24 - 66:18 SC	
	66:2 - 66:11 Q; T	
	66:16 - 66:17 Q; T	
	66:22 - 66:23 Q; T	
	67:11 - 67:16 SC	
	67:14 - 67:15 Q; T	
	67:17 - 68:11 R; 403	
	68:8 - 68:9 Q; T	
	68:13 - 69:2 SC	
	68:16 - 68:18 Q; T	
	68:23 - 69:1 Q; T	
	69:4 - 69:20 R; 403; SC; MIL	
	69:7 - 69:8 Q; T	
	69:13 - 69:14 Q; T	
	69:22 - 70:20 SC; R; 403; MIL	
	69:25 - 70:3 Q; T	
	70:13 - 70:14 Q; T	
	70:24 - 71:3 Q; T	
	71:8 - 72:8 SC; R; 403; MIL	
	71:9 - 71:10 Q; T	
	71:19 - 71:19 Q; T	
	71:23 - 71:23 Q; T	
	72:4 - 72:11 K; F; S; R; 403	
	72:6 - 72:7 Q; T	
	72:9 - 72:10 Q; T	
	72:13 - 72:16 R; 403; K; F; S	
	72:15 - 72:15 Q; T	
	72:18 - 73:24 SC; R; 403; K; F; S	
	72:23 - 72:24 Q; T	
	73:3 - 73:3 Q; T	
	73:13 - 73:17 Q; T	
	73:23 - 73:23 Q; T	
	74:2 - 75:3 SC; R; 403; K; F; S	
	74:7 - 74:8 Q; T	
	74:17 - 74:20 Q; T	
	74:24 - 75:1 Q; T	
	75:5 - 75:25 SC; R; 403; K; F; S	
	75:16 - 75:17 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	75:22 - 75:23 Q; T 76:2 - 77:5 SC; R; 403; K; F; S 76:3 - 76:5 Q; T 76:16 - 76:17 Q; T 76:22 - 76:23 Q; T 77:7 - 79:6 SC; R; 403; K; F; S 77:17 - 77:21 Q; T 78:6 - 78:7 Q; T 78:12 - 78:12 Q; T 78:15 - 78:15 Q; T 78:18 - 78:19 Q; T 78:24 - 78:25 Q; T 79:4 - 79:4 Q; T	
83:5 – 91:5	83:5 - 83:12 Q; T 83:14 - 83:18 Q; T 84:2 - 84:8 V; F 84:5 - 84:6 Q; T 84:14 - 84:17 Q; T 84:21 - 84:23 Q; T 85:22 - 85:24 Q; T 86:3 - 86:3 Q; T 86:8 - 86:17 F; K; S 86:12 - 86:15 Q; T 86:22 - 87:2 Q; T 87:15 - 87:16 Q; T 88:1 - 88:2 Q; T 88:11 - 88:20 Q; T 88:23 - 88:24 Q; T 89:14 - 89:14 Q; T 89:21 - 89:23 Q; T 89:24 - 90:7 Q; T 90:3 - 90:5 T 90:6 - 90:7 Q; T 90:13 - 90:15 Q; T	163:13 - 163:20
92:25 – 95:25	93:3 - 93:13 Q; T 93:19 - 93:20 Q; T 94:2 - 94:3 Q; T 94:9 - 94:10 Q; T 94:17 - 94:18 Q; T 94:21 - 95:8 SC; 403; LC; F; K; S	163:23 - 163:23

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	94:24 - 95:1 Q; T 95:10 - 95:25 SC; 403; LC; K; F; S 95:13 - 95:23 Q; T	
97:11 – 99:8	97:11 - 97:13 Q; F; S 97:15 - 97:20 F; S 97:16 - 97:17 Q; T 97:23 - 97:24 Q; T 98:10 - 98:11 Q; T 98:13 - 98:15 Q; T 98:17 - 98:19 Q; T 99:1 - 99:4 Q; T	163:25 - 163:25
100:6-116:13	100:6 - 106:10 R; 403 100:8 - 100:9 Q; T 100:10 - 100:16 Q; T 100:23 - 100:25 Q; T 101:4 - 101:10 SC; R; 403; LC; S; F; K 101:7 - 101:9 Q; T 101:12 - 101:22 SC; R; 403; LC; F; S; K 101:15 - 101:17 Q; T 102:15 - 102:17 Q; T 102:18 - 103:7 Q; T 103:24 - 104:1 Q; T 104:2 - 104:15 SC; M; K; F; S 104:4 - 104:6 Q; T 104:12 - 104:13 Q; T 105:4 - 105:5 Q; T 105:8 - 105:10 Q; T 106:6 - 106:8 Q; T 106:12 - 107:4 SC; LC; K; F; S; R; 403 106:14 - 106:16 Q; T 107:8 - 107:11 Q; T 107:18 - 107:20 Q; T 108:3 - 108:16 SC; F; S; K 108:7 - 108:8 Q; T 108:18 - 109:4 R; 403 108:21 - 108:23 Q; T 109:6 - 109:16 SC; LC; K; F; S; R; 403 109:10 - 109:12 Q; T 109:18 - 110:6 SC; LC; R; 403 109:23 - 110:4 Q; T	164:17 - 164:18

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	110:8 - 111:3 SC; LC; M; K; F; S; R; 403 110:13 - 110:24 Q; T 111:5 - 111:12 SC; LC; F; K; S 111:8 - 111:10 Q; T 111:14 - 112:4 SC; LC; K; F; S 111:18 - 111:22 Q; T 112:6 - 112:12 SC; V; F; K; S 112:9 - 112:11 Q; T 112:14 - 113:10 SC; R; K; F; S; R; 403 112:17 - 112:19 Q; T 113:13 - 113:14 Q; T 113:17 - 113:23 SC; V; R; 403 113:18 - 113:20 Q; T 113:25 - 114:1 SC; LC; IO; K; S; F; H; R; 403 114:2 - 114:6 Q; T 114:7 - 114:17 Q; T 114:18 - 114:19 Q; T 114:20 - 114:21 Q; T 114:22 - 114:23 SC; LC; IO; K; S; F; H; R; 403 114:25 - 115:4 SC; LC; C; MC; K; F; S; 403; R 115:5 - 115:19 Q; T 115:20 - 115:22 SC; LC; C; MC; K; F; S; 403; R 115:24 - 116:5 SC; R; 403; M 116:1 - 116:3 Q; T 116:7 - 116:13 SC; R; 403; K; F; S 116:8 - 116:10 Q; T	
132:9-135:2	132:9 - 133:2 SC; LC 132:12 - 132:20 Q; T 133:8 - 133:9 Q; T 133:16 - 133:24 SC; LC; K; F; S; V; A; H 133:17 - 133:19 Q; T 134:13 - 134:17 Q; T 134:20 - 135:2 R 134:22 - 134:25 Q; T	164:21 - 164:22
141:9-150:17	142:2 - 142:8 Q; T 143:12 - 143:13 Q; T	164:25 - 165:1

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	143:21 - 143:22 Q; T 144:18 - 144:22 T 145:19 - 146:3 V; R 145:23 - 145:25 Q; T 146:8 - 146:10 Q; T 147:18 - 147:19 Q; T 147:24 - 147:25 Q; T 148:5 - 148:5 Q; T 148:12 - 148:12 Q; T 148:16 - 148:17 Q; T 149:13 - 149:14 Q; T 149:23 - 149:25 Q; T 150:8 - 150:10 Q; T 150:15 - 150:16 Q; T	
153:2-154:20	153:4 - 153:4 Q; T 153:19 - 154:20 R; 403 153:21 - 153:24 Q; T 154:6 - 154:6 Q; T 154:9 - 154:10 Q; T 154:16 - 154:17 Q; T	
155:3-156:21	155:8 - 155:9 Q; T 155:16 - 155:19 V 155:18 - 155:18 Q; T 155:23 - 156:1 Q; T 156:19 - 156:20 Q; T	
159:22-163:11	160:8 - 160:8 Q; T 160:15 - 160:19 V 160:17 - 160:18 Q; T 160:21 - 161:1 S; A; F; H; K 160:22 - 160:24 Q; T 161:3 - 161:17 R 161:7 - 161:15 Q; T 161:19 - 162:2 R 161:21 - 161:23 Q; T 162:3 - 162:9 R 162:5 - 162:6 Q; T 162:10 - 162:17 SC; V; H; F; S; K; 403 162:13 - 162:15 Q; T 162:25 - 163:11 SC; H; V 163:2 - 163:10 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations		Defendants' Counter Designations
164:3-7			
167:10 – 22	167:10 - 167:18 167:13 - 167:14	SC; V; K; F; S Q; T	
170:1-172:17	170:1 - 170:1 170:2 - 170:8 170:4 - 170:5 170:10 - 170:25 170:12 - 170:14 170:19 - 170:19 170:24 - 170:24 171:12 - 171:19 171:14 - 171:16 171:21 - 172:4 171:22 - 171:22 172:2 - 172:3 172:6 - 172:17 172:8 - 172:16	Q V; F:S Q; T V; F:S Q; T Q; T Q; T V; F:S Q; T SC; R; 403; K; F; S Q; T Q; T SC; LC; R; 403; S; F; K Q; T	
174:3 – 23	174:3 - 174:9 174:4 - 174:5 174:11 - 174:23 174:12 - 174:14 174:20 - 174:21	SC; R; 403; F; S; K Q; T SC; R; 403; LC; K; F; S Q; T Q; T	
176:2 – 178:4	176:6 - 176:7 176:8 - 176:15 176:17 - 176:23 176:20 - 176:22 177:9 - 177:9 177:13 - 177:18 177:14 - 177:16 178:1 - 178:3	T Q; T SC; V; F; S; K Q; T Q; T SC; 403; K; F; S Q; T Q; T	
179:5 - 180:11	179:5 - 180:2 179:7 - 179:8 179:13 - 179:15 179:21 - 179:22 180:4 - 180:11 180:5 - 180:6 180:10 - 180:10	SC; R; F; K; S Q; T Q; T Q; T SC; F; K; S Q; T Q; T	
184:7-213:20	185:3 - 185:3 185:4 - 185:4 185:10 - 185:11	Q; T Q; T Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	185:23 - 185:25 SC; F; K; S 186:1 - 186:3 Q; T 186:4 - 186:8 Q; T 186:9 - 186:13 SC; K; F; S 187:3 - 187:4 Q; T 187:8 - 187:12 Q; T 192:6 - 192:11 Q; T 192:16 - 192:17 Q; T 193:11 - 193:12 Q; T 193:16 - 194:10 F; S 193:19 - 193:21 Q; T 194:1 - 194:3 Q; T 194:8 - 194:8 Q; T 194:14 - 194:15 Q; T 195:5 - 195:6 Q; T 195:8 - 195:12 Q; T 200:8 - 200:9 Q; T 201:17 - 201:18 Q; T 202:9 - 202:18 Q; T 203:16 - 203:17 Q; T 204:4 - 204:4 Q; T 204:10 - 204:11 Q; T 204:23 - 204:23 Q; T 205:7 - 205:7 Q; T 205:11 - 205:11 Q; T 206:4 - 206:6 Q; T 207:2 - 207:5 Q; T 207:20 - 207:24 Q; T 210:15 - 210:15 Q; T 211:24 - 211:24 Q; T 212:9 - 212:10 Q; T 212:15 - 212:15 Q; T 213:10 - 213:16 Q; T	
214:14-222:20	216:5 - 216:6 Q; T 220:13 - 220:20 SC; R; S; F; K 220:15 - 220:16 Q; T 221:1 - 221:7 Q; T 221:12 - 221:16 Q; T 221:21 - 222:3 V; M 221:25 - 222:1 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	222:6 - 222:7 Q; T	
223:1-234:18	226:17 - 226:18 Q; T 228:3 - 228:19 V; C 232:14 - 232:17 SC; F 232:17 - 232:22 SC; F 233:8 - 233:8 Q; T 233:15 - 234:18 F 234:4 - 234:4 Q; T	
235:7 – 250:23	235:7 - 238:19 R; 403; 236:15 - 236:16 Q; T 237:8 - 237:9 Q; T 237:24 - 237:24 Q; T 238:4 - 238:5 Q; T 238:9 - 238:10 Q; T 239:7 - 239:20 F; A; K 239:9 - 239:10 Q; T 239:15 - 239:17 Q; T 240:3 - 240:4 Q; T 241:2 - 245:14 SC; 403:R 241:11 - 241:12 Q; T 241:19 - 241:19 Q; T 242:2 - 242:4 Q; T 242:12 - 242:12 Q; T 242:20 - 242:20 Q; T 243:10 - 243:11 Q; T 243:18 - 243:21 Q; T 244:4 - 244:5 Q; T 244:10 - 244:11 Q; T 244:16 - 244:17 Q; T 244:23 - 245:3 Q; T 245:10 - 245:12 Q; T 246:13 - 246:15 Q; T 246:22 - 246:23 Q; T 247:3 - 247:3 Q; T 247:23 - 247:23 Q; T 248:6 - 248:11 Q; T 249:2 - 249:3 Q; T 249:11 - 249:23 SC; LC; K; F; S 249:15 - 249:18 Q; T 249:25 - 250:3 SC; LC; K; F; S	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	250:2 - 250:2 Q; T 250:5 - 250:15 SC; F; K; S 250:7 - 250:14 Q; T 250:17 - 250:23 SC; K; F; S 250:19 - 250:22 Q; T	
251:13 – 257:17	251:13 - 257:17 R; 403; MIL 254:6 - 254:8 Q; T 254:13 - 254:13 Q; T 255:15 - 255:16 Q; T 255:20 - 255:23 SC; R; F; K; S 255:21 - 255:22 Q; T 255:25 - 256:7 SC; R; 403; K; F; S 256:2 - 256:2 Q; T 256:14 - 256:20 SC; R; 403; K; F; S 256:16 - 256:17 Q; T	
259:18 – 264:5	259:18 - 260:1 R; 403; MIL 259:23 - 259:23 Q; T 260:2 - 260:12 SC; R; 403; K; F; S; MIL 260:4 - 260:5 Q; T 260:14 - 263:19 R; 403; MIL 260:16 - 260:16 Q; T 262:6 - 262:8 Q; T 262:18 - 262:19 Q; T 263:4 - 263:4 Q; T 263:11 - 263:12 Q; T 263:17 - 263:18 Q; T 263:21 - 264:5 SC; R; 403; K; F; S; MIL 263:23 - 263:24 Q; T 263:25 - 264:4 Q; T	
264:17-265:25	264:17 - 265:25 SC; LC; R; 403; F; S; K 265:14 - 265:16 Q; T	
269:22-273:10	269:22 - 270:24 F 270:16 - 270:18 Q; T 271:2 - 271:17 F 271:5 - 271:7 Q; T 271:15 - 271:16 Q; T 271:18 - 273:10 R; 403; F 272:20 - 272:21 Q; T 273:6 - 273:7 Q; T	
275:14 – 296:4	276:4 - 279:21 R; 403	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	276:9 - 276:17 Q; T 277:9 - 277:10 Q; T 277:15 - 277:22 Q; T 279:22 - 280:12 Q; T 280:13 - 282:13 R; 403 281:14 - 281:16 Q; T 282:14 - 284:21 R; 403; F 282:22 - 282:23 Q; T 283:11 - 283:12 Q; T 283:17 - 283:18 Q; T 284:3 - 284:4 Q; T 284:11 - 284:12 Q; T 284:17 - 284:18 Q; T 284:24 - 285:7 R; 403; SC 285:8 - 285:9 SC; R; 403 285:10 - 285:14 Q; T 285:15 - 286:17 Q; T 286:18 - 286:18 Q; T 286:19 - 286:23 SC; R; 403 286:25 - 288:10 R; 403; SC 287:3 - 287:3 Q; T 287:8 - 287:9 Q; T 287:13 - 287:13 Q; T 287:18 - 287:18 Q; T 288:11 - 288:19 Q; T 290:9 - 293:7 R; 403 290:20 - 290:21 Q; T 293:5 - 293:5 Q; T 293:8 - 296:4 SC; R; 403 293:12 - 293:14 Q; T 293:18 - 293:19 Q; T 294:7 - 294:7 Q; T 294:14 - 294:17 Q; T 295:8 - 295:8 Q; T	
298:15-300:3	299:1 - 299:3 Q; T 299:8 - 299:8 Q; T 299:13 - 299:13 Q; T 299:16 - 299:22 SC; R; 403 299:18 - 299:21 Q; T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

K. JASON ARGENT

Defendants submit the below counter-designations and objections to the designations for the deposition of Jason Argent:

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
12:3 – 10		26:14 - 27:1
16:4 – 26:3	16:13 - 16:17 R; HR 16:18 - 16:20 T 16:21 - 17:7 R; T 17:8 - 17:16 K; F 17:17 - 18:3 SC 18:4 - 19:5 SC; T 19:6 - 19:25 SC 20:1 - 20:5 T 20:6 - 20:24 SC 20:25 - 21:3 T 21:4 - 21:13 SC 21:14 - 21:18 T 22:11 - 22:13 K; F; M 22:14 - 22:15 T 22:16 - 22:18 K; F; M 22:20 - 22:23 Q 22:24 - 22:24 T 23:2 - 23:4 V; K; F; M 23:5 - 23:15 R; 403; K; F 23:16 - 23:18 V; SC 23:19 - 23:21 T; 403 23:23 - 24:1 V; R; 403 24:2 - 24:4 T 24:6 - 24:10 V; R 24:11 - 24:12 R; HR 25:1 - 25:2 R; HR 25:3 - 26:3 R; 403; HR	28:15 - 28:21
26:14-29:3	27:2 - 27:5 K; F; R 27:6 - 27:21 R; 403 27:22 - 27:23 P 27:24 - 28:3 T 28:5 - 28:7 T 28:8 - 28:14 P	34:25 - 35:2

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	28:15 - 29:3 R; 403	
31:6 – 37:10	31:6 - 32:4 R; 403 32:5 - 32:7 F; K; S; V 32:8 - 32:11 T 32:12 - 32:18 F; K; S; V 33:8 - 34:24 Q; T; F; K 34:25 - 35:2 K; S; F; LC 35:3 - 35:3 T 35:4 - 35:10 K; S; F; LC 35:11 - 35:11 T 35:12 - 35:15 K; S; F; LC 35:17 - 35:21 K; S; F; LC; V 35:22 - 35:22 T 35:23 - 35:24 K; S; F; LC; V 36:2 - 36:5 P; R; 403; LC 36:6 - 36:11 T 36:12 - 36:19 LC 36:21 - 36:22 V 36:23 - 36:23 T 36:24 - 37:4 V 37:6 - 37:10 V	35:4 - 35:7
41:6-44:1	41:6 - 41:7 P; R 41:8 - 41:12 T 41:14 - 41:17 P; R 41:18 - 42:9 T 42:11 - 42:13 M 42:14 - 42:16 T 42:17 - 42:23 P; R 42:24 - 42:25 P; R 43:1 - 43:8 T 43:17 - 43:19 V; R 43:20 - 43:20 T 43:22 - 43:22 V; R 43:23 - 43:23 T 43:24 - 44:1 V; R	35:9 - 35:10
45:18 – 50:23	45:18 - 46:9 R; V 46:10 - 46:11 T 46:12 - 46:22 R; V 46:23 - 46:23 T 46:24 - 47:3 R; V	35:12 - 35:15

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	47:4 - 47:4 T 47:5 - 47:14 R; V 47:15 - 47:15 T 47:16 - 47:19 R; V 47:20 - 47:20 T 47:22 - 47:22 R; V 47:23 - 47:23 T 47:25 - 47:25 R; V 48:1 - 48:1 T 48:2 - 48:4 R; V 48:5 - 48:5 T 48:6 - 48:9 R; V 48:10 - 48:10 T 48:11 - 48:15 R; V 48:16 - 48:16 T 48:17 - 48:22 R; V 48:23 - 48:23 T 48:24 - 49:12 R; V 49:13 - 49:13 T 49:23 - 50:16 T 50:20 - 50:20 T	
53:5-61:17	53:5 - 53:7 V 53:8 - 53:8 T 53:9 - 53:13 B 53:15 - 53:17 SC; V; MIL 53:18 - 53:19 T 53:20 - 53:23 SC; V; MIL 53:25 - 54:3 SC; R; MIL 54:4 - 54:5 T 54:6 - 54:12 SC; R; MIL 54:13 - 54:14 T 54:17 - 55:13 SC; R; MIL 55:14 - 55:15 K; F; R; MIL 55:16 - 55:16 T 55:17 - 55:19 K; F; R; MIL 55:21 - 56:11 R; SC; LC 56:12 - 56:18 T 56:19 - 56:23 R; SC; LC; MIL 56:24 - 56:24 T 56:25 - 57:2 R; SC; LC; MIL	35:18 - 35:21

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	57:4 - 57:5 P; SC; R; MIL 57:6 - 57:11 T 57:12 - 57:12 P; SC 57:14 - 57:22 SC; LC; MIL 57:23 - 57:24 SC; F; K; S; P; MIL; R 57:25 - 58:3 T 58:4 - 58:4 SC; F; K; S; P 58:6 - 58:20 SC; LC; MIL 58:22 - 58:24 S; K; F; V; LC; R; MIL 58:25 - 59:1 T 59:2 - 59:3 S; K; F; V; LC; R; MIL 59:5 - 59:9 S; K; F; V; LC; R; MIL 59:10 - 59:11 T 59:12 - 59:13 S; K; F; V; R; MIL 59:14 - 59:15 T 59:16 - 59:19 T 59:20 - 59:23 S; K; F; V; RR; MIL 59:25 - 60:1 V; SC; R; MIL 60:2 - 60:4 T 60:5 - 60:8 V; SC; R; MIL 60:10 - 60:13 M; V; R; MIL 60:14 - 60:15 T 60:16 - 60:19 M; V; R; MIL 60:21 - 61:1 K; F; R 61:2 - 61:4 P; R; MIL 61:5 - 61:9 T 61:13 - 61:17 F; K; S	
63:20 – 82:7	63:20 - 63:20 V 63:21 - 63:21 T 63:22 - 63:23 V 64:19 - 65:3 T 65:8 - 65:8 T 66:1 - 66:4 SC; V 66:5 - 66:7 T 66:8 - 66:15 SC; V 66:20 - 67:15 SC 67:16 - 67:18 T 67:19 - 67:24 SC 67:25 - 68:2 T 68:5 - 68:11 V	35:23 - 35:24

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	68:12 - 68:12 T	
	68:13 - 68:23 V; SC	
	68:24 - 69:2 T	
	69:3 - 69:16 V; SC	
	69:17 - 69:19 NQ; C	
	69:20 - 69:22 T	
	70:1 - 70:1 T	
	70:9 - 70:10 SC	
	70:11 - 70:12 T	
	70:13 - 70:16 SC	
	70:18 - 70:18 SC	
	70:19 - 70:19 T	
	70:20 - 70:20 SC	
	70:22 - 70:23 SC	
	70:24 - 70:24 T	
	70:25 - 70:25 SC	
	71:2 - 71:7 M	
	71:8 - 71:9 T	
	71:11 - 71:17 SC	
	71:18 - 71:21 T	
	71:22 - 71:25 SC	
	72:2 - 72:4 V	
	72:5 - 72:5 T	
	72:6 - 72:9 V	
	72:10 - 72:17 Q; T	
	72:18 - 72:20 V; SC	
	72:21 - 72:22 T	
	72:23 - 73:2 V; SC	
	73:4 - 73:7 SC; K; S; F; V	
	73:8 - 73:10 T	
	73:11 - 73:15 SC; K; S; F; V	
	73:17 - 73:18 SC; K; S; F; V	
	73:19 - 73:19 T	
	73:20 - 73:25 SC; K; S; F; V	
	74:1 - 74:2 T	
	74:3 - 74:7 SC; K; S; F; V	
	74:8 - 74:12 SC; LC	
	74:13 - 75:2 T	
	75:3 - 75:8 SC; LC; F; K; S	
	75:9 - 75:10 T	
	75:11 - 75:12 SC; LC; F; K; S	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	75:14 - 75:15 V 75:16 - 75:16 T 76:1 - 76:2 T 76:10 - 76:13 R; K; F; HR 76:16 - 78:7 F; K 78:8 - 78:10 SC; F 78:11 - 78:13 T 78:14 - 78:24 SC; F; K 78:25 - 78:25 T 79:1 - 79:5 SC; F; K 79:6 - 79:7 T 79:8 - 79:11 SC; F; K 79:12 - 79:13 T 79:14 - 79:17 SC; F; K 79:18 - 79:19 T 79:20 - 79:24 SC; F; K 79:25 - 79:25 T 80:1 - 80:5 SC; F; K 80:6 - 80:7 T 80:8 - 80:12 SC; F; K; V 80:13 - 80:13 T 80:14 - 80:19 SC; F; K; V 80:20 - 80:22 SC; F; K; V 80:23 - 80:24 T 80:25 - 81:3 SC; F; K 81:4 - 81:6 SC; F; K; V 81:7 - 81:8 T 81:9 - 81:15 SC; F; K 81:16 - 81:17 T 81:18 - 81:18 SC; F; K 81:19 - 81:25 Q; QUESTION STRUCK 82:1 - 82:2 SC; F; K 82:3 - 82:4 T 82:5 - 82:7 SC; F; K	
98:18-100:20	98:18 - 98:21 SC; F; K; V 98:22 - 98:23 T 98:24 - 99:3 SC; F; K; V 99:4 - 99:4 T 99:5 - 99:15 SC; F; K; V 99:16 - 99:18 T	36:2 - 36:5

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	99:19 - 99:23 SC; F; K; V 99:24 - 100:1 SC; F; K; V; M 100:2 - 100:3 T 100:4 - 100:10 SC; F; K; V; M 100:11 - 100:12 T 100:13 - 100:18 SC; F; K; V 100:19 - 100:19 T 100:20 - 100:20 SC; F; K; V	
105:21-106:9	105:24 - 105:25 SC; V 106:1 - 106:2 T 106:3 - 106:6 SC; V 106:7 - 106:7 T 106:8 - 106:9 SC; V	36:12 - 36:19
108:6 – 137:20	109:8 - 109:9 R; 403; V 109:10 - 109:10 T 109:11 - 109:13 R; 403; V 110:1 - 110:3 F; K; V 110:4 - 110:4 T 110:5 - 110:6 S; K; V 111:19 - 112:1 T 113:10 - 113:12 SC; R 113:13 - 113:14 T 113:15 - 113:17 SC; R 114:6 - 114:7 SC; F; K; S 114:8 - 114:10 T 114:11 - 114:14 SC; F; K; S 116:14 - 116:16 SC 116:17 - 116:17 T 116:18 - 116:19 SC 116:21 - 116:24 SC 116:25 - 117:1 T 117:2 - 117:8 SC 117:9 - 117:11 T 117:12 - 117:18 SC 117:25 - 118:1 SC; R 118:2 - 118:3 T 118:4 - 118:7 SC; R 118:8 - 118:11 SC; R; F; K 118:12 - 118:13 T 118:14 - 118:16 SC; R; F; K	36:21 - 36:22

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	118:17 - 118:18 SC	
	118:19 - 118:20 T	
	118:21 - 118:24 SC	
	119:2 - 119:3 SC; F; K; S	
	119:4 - 119:6 T	
	119:7 - 119:7 T	
	119:25 - 120:2 V; F; K; S; MIL	
	120:3 - 120:3 T	
	120:4 - 120:15 V; F; K; S; MIL	
	120:16 - 120:17 SC; LC	
	120:18 - 120:19 T	
	120:20 - 120:21 SC; LC; MIL	
	120:23 - 121:3 M; MIL	
	121:4 - 121:5 T	
	121:6 - 121:7 M; MIL	
	121:9 - 121:10 SC; M; MIL	
	121:11 - 121:12 T	
	121:13 - 121:16 SC; M; MIL	
	122:1 - 122:3 F; K; S; SC; M	
	122:4 - 122:6 T	
	122:7 - 122:8 F; K; S; SC; M	
	122:10 - 122:11 F; K; S; SC; M	
	122:12 - 122:13 T	
	122:14 - 122:18 F; K; S; SC; M	
	122:20 - 122:21 F; K; S; SC; M	
	124:5 - 124:6 SC; V; R; MIL	
	124:7 - 124:8 SC	
	124:9 - 124:17 SC; R; V; MIL	
	126:13 - 126:25 R; LC; MIL	
	127:1 - 127:2 T	
	127:3 - 127:17 R; SC; LC; MIL	
	127:18 - 127:19 T	
	127:20 - 127:24 R; SC; LC; MIL	
	127:25 - 127:25 T	
	128:1 - 128:3 R; SC; LC; MIL	
	128:4 - 128:4 T	
	128:5 - 128:10 R; SC; LC; MIL	
	129:23 - 129:24 SC	
	129:25 - 129:25 T	
	130:1 - 130:5 SC	
	130:7 - 130:8 SC	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	130:9 - 130:9 T 130:12 - 130:12 NQ 130:15 - 130:18 SC; V 130:19 - 130:19 T 130:20 - 130:20 SC; V 130:22 - 130:23 SC; V 130:24 - 131:4 T 131:5 - 131:12 SC; V 131:13 - 131:14 T 131:15 - 131:19 SC; V 131:20 - 131:20 T 131:21 - 131:22 SC; V 134:7 - 134:15 SC 134:16 - 134:21 T 134:22 - 134:24 SC 135:4 - 135:5 SC 135:6 - 135:6 T 135:7 - 135:9 SC 135:16 - 135:17 SC; K; F; S 135:18 - 135:18 T 135:19 - 135:22 SC; K; F; S 137:16 - 137:18 K; F; S 137:19 - 137:20 T	
138:16-164:23	138:18 - 138:25 SC; F; K; P; R; MIL; HR 139:1 - 139:7 T 139:8 - 139:13 SC; F; K; P; R; MIL; HR 139:15 - 140:15 F; K; HR; LC 140:16 - 140:18 T 140:19 - 141:2 F; K; HR; LC 141:3 - 141:9 T 141:10 - 141:13 F; K; HR; LC 141:14 - 141:15 T 141:17 - 143:23 F; K; HR; LC 143:24 - 143:25 F; K; HR; LC; V 144:1 - 144:1 F; K; HR; LC; V 144:2 - 144:5 F; K; HR; LC; V 144:6 - 144:6 T 144:7 - 144:16 F; K; HR; LC; S 144:17 - 144:18 T 144:19 - 144:25 F; K; HR; LC; S	36:24 - 37:4

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	145:1 - 145:1 T	
	145:2 - 145:4 F; K; HR; LC; S	
	145:5 - 145:5 T	
	145:6 - 145:16 F; K; HR; LC	
	145:17 - 145:18 T	
	145:19 - 145:23 STRUCK QUESTION	
	145:24 - 146:2 F; K; HR; LC	
	146:3 - 146:3 T	
	146:4 - 146:9 F; K; HR; LC; V	
	146:10 - 146:10 T	
	146:11 - 146:15 F; K; LC; HR; V	
	146:16 - 146:16 T	
	146:17 - 146:24 F; K; LC	
	146:25 - 147:1 T	
	147:2 - 147:4 F; K; LC	
	147:9 - 147:11 LC; M; R	
	147:12 - 147:13 T	
	147:14 - 147:17 LC; M; R	
	147:18 - 147:21 T	
	147:23 - 149:8 HR; LC; K; F; S	
	149:9 - 149:9 T	
	149:11 - 149:14 F; K; S; LC	
	149:15 - 149:16 T	
	149:17 - 150:1 T; Q	
	150:3 - 151:6 R; HR	
	151:7 - 151:9 R; HR; SC	
	151:10 - 151:11 T	
	151:12 - 151:15 R; HR; SC	
	151:16 - 151:16 T	
	151:17 - 151:22 R; HR; SC	
	151:23 - 151:23 T	
	151:24 - 151:25 T; HR; SC	
	152:2 - 152:3 P	
	152:4 - 152:10 T	
	152:11 - 152:17 HR; SC	
	152:19 - 152:20 R; SC	
	152:21 - 152:23 T	
	152:24 - 153:9 Q; T	
	153:14 - 153:14 T	
	153:18 - 153:20 V; R	
	153:21 - 154:3 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	154:4 - 154:8 V; R; HR; SC	
	154:9 - 154:9 T	
	154:10 - 154:19 V; R; SC; HR	
	154:20 - 154:21 SC; V	
	154:22 - 154:23 T	
	154:24 - 155:24 T	
	155:25 - 156:6 T	
	156:7 - 156:8 SC; V	
	156:10 - 156:11 SC	
	156:12 - 156:12 T	
	156:13 - 156:14 SC	
	156:16 - 156:18 F; K; S; R	
	156:19 - 156:20 T	
	156:21 - 156:25 F; K; S; R	
	157:1 - 157:1 T	
	157:4 - 157:6 F; K; S; R	
	157:7 - 157:18 M; R; F; K; S	
	157:19 - 157:20 T	
	157:21 - 158:4 F; K; S; LC	
	158:4 - 158:6	
	158:7 - 158:13 F; K; S; LC; SC	
	158:14 - 158:14 T	
	158:15 - 158:21 F; K; S; LC; SC	
	158:22 - 158:22 T	
	158:24 - 159:1 F; K; SC; LC	
	159:2 - 159:3 T	
	159:4 - 159:8 F; K; SC; LC	
	159:9 - 159:10 T	
	159:11 - 159:12 F; K; SC; LC	
	159:14 - 159:16 F; K; SC; LC; P	
	159:17 - 159:21 T	
	159:22 - 160:2 F; K; SC; LC	
	160:4 - 160:6 F; K; SC; LC; M	
	160:7 - 160:9 T	
	160:10 - 160:11 F; K; SC; LC	
	160:12 - 160:18 HR	
	160:19 - 160:19 LC	
	160:20 - 160:21 T	
	160:22 - 161:3 LC	
	161:4 - 161:17 Q; T	
	161:18 - 161:24 LC	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	161:25 - 162:1 T 162:2 - 162:9 LC 162:10 - 162:11 T 162:12 - 162:12 LC 162:25 - 162:25 T 163:4 - 163:7 LC; HR 163:8 - 163:9 T 163:10 - 164:3 LC; HR; SC 164:4 - 164:5 T 164:6 - 164:11 LC; SC 164:12 - 164:13 T 164:14 - 164:16 LC; SC	
169:7-207:15	169:7 - 169:8 LC 169:9 - 169:10 LC 169:11 - 169:16 LC 169:17 - 169:18 T 169:19 - 170:2 LC 170:3 - 170:4 T 170:5 - 170:10 LC 170:11 - 170:12 T 170:13 - 170:17 LC; K; F 170:18 - 170:19 T 170:20 - 170:23 LC; K; F 172:4 - 172:4 T 172:20 - 172:24 T 173:4 - 173:6 T 173:8 - 173:13 R; 403 173:14 - 173:15 LC 173:16 - 173:17 T 173:18 - 173:18 LC 173:23 - 173:23 T 174:3 - 174:3 V; LC 174:4 - 174:5 T 174:6 - 174:8 LC 174:10 - 174:14 LC 174:15 - 174:16 T 174:18 - 174:19 LC 174:20 - 174:21 LC; K; F; S 174:22 - 174:23 T 174:24 - 175:10 LC; K; F; S	38:5 - 38:10

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	175:11 - 175:12 T	
	175:13 - 175:14 LC; K; F; S	
	175:23 - 175:25 LC; K; F; S	
	176:1 - 176:2 T	
	176:3 - 176:5 LC; K; F; S	
	176:7 - 176:13 LC; K; F; S	
	176:14 - 176:15 T	
	176:16 - 176:16 LC; K; F; S	
	176:18 - 176:19 LC; K; F; S	
	176:20 - 176:21 T	
	176:22 - 176:23 LC; K; F; S	
	176:25 - 176:25 LC; K; F; S; P	
	177:1 - 177:6 T	
	177:7 - 177:10 LC; K; F; S	
	177:12 - 177:13 P	
	177:14 - 178:13 T; Q	
	178:14 - 180:1 T; Q	
	180:2 - 180:4 R; 403; P	
	180:5 - 180:8 T	
	180:9 - 181:1 R; 403; P	
	181:2 - 181:3 T	
	181:4 - 181:5 K; F; S; R; 403	
	181:6 - 181:6 T	
	181:7 - 181:8 K; F; S; R; 403	
	181:10 - 181:13 SC; LC; MIL	
	181:14 - 181:15 T	
	181:16 - 181:18 T	
	181:19 - 181:24 SC; LC; MIL	
	182:2 - 182:10 SC; LC; MIL	
	182:11 - 182:13 T	
	182:14 - 182:19 SC; LC	
	182:21 - 182:23 SC; LC; V	
	182:24 - 182:25 T	
	183:1 - 183:7 SC; LC	
	183:8 - 183:8 P; LC; SC	
	183:9 - 183:10 T	
	183:11 - 183:13 P; LC; SC	
	183:15 - 183:19 P; SC; LC	
	183:20 - 183:22 T	
	183:23 - 183:24 P; SC; LC	
	183:25 - 184:2 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	184:4 - 184:9 SC; LC; V; MIL	
	184:10 - 184:12 T	
	184:13 - 184:20 SC; LC; V; MIL	
	184:21 - 184:23 T	
	184:24 - 185:2 SC; LC; V; MIL	
	185:3 - 185:3 T	
	185:4 - 185:11 T	
	185:12 - 185:19 SC; LC; MIL	
	185:20 - 185:20 T	
	185:21 - 186:1 SC; LC; MIL	
	186:2 - 186:5 M; LC	
	186:6 - 186:7 T	
	186:8 - 186:12 M; V	
	186:13 - 186:13 T	
	186:14 - 186:15 M; V	
	186:23 - 188:3 LC; HR; F; K; S	
	188:4 - 188:5 T	
	188:6 - 189:17 LC; HR; F; K; S	
	189:18 - 189:19 T	
	189:20 - 190:8 LC; HR; F; K; S	
	190:9 - 190:10 T	
	190:11 - 190:13 LC; HR; F; K; S	
	190:14 - 191:11 R; 403; SC	
	191:12 - 191:12 T	
	191:13 - 193:24 LC; HR; F; K; SC; R	
	193:25 - 193:25 T	
	194:1 - 194:3 SC	
	194:4 - 194:19 LC; SC; R	
	194:20 - 194:21 T	
	194:22 - 196:3 LC; SC; R; HR	
	196:4 - 196:5 T	
	196:6 - 196:10 LC; SC; R; HR	
	196:11 - 196:11 T	
	196:12 - 197:1 LC; SC; R	
	197:2 - 197:11 T; R; HR	
	197:12 - 198:2 LC; HR; R	
	198:3 - 198:4 T	
	198:5 - 198:20 R; 403; V	
	198:21 - 198:22 T	
	198:24 - 201:8 R	
	201:9 - 201:11 T	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	201:12 - 203:12 R; 403; M; F; K; S 203:13 - 203:14 T 203:15 - 204:1 R; 403; F; K; S 204:2 - 204:3 T 204:5 - 205:10 R; 403; F; K; S 205:11 - 205:11 T 205:12 - 205:16 R; 403; F; K; S; V 205:17 - 205:17 T 205:18 - 205:22 R; 403; F; K; S 205:23 - 206:2 T 206:3 - 206:8 R; 403 206:9 - 206:9 T 206:10 - 206:10 R; 403 206:11 - 206:11 T 206:13 - 207:6 R; 403; LC 207:7 - 207:8 T 207:9 - 207:15 R; 403	
209:19-222:21	209:19 - 209:19 R; 403; F; K; SC; MIL 209:20 - 211:4 SC; F 211:5 - 211:7 T 211:8 - 211:16 SC; F 211:17 - 211:17 T 211:18 - 212:1 SC; F; K; M 212:2 - 212:3 T 212:4 - 212:8 SC; F; K 212:9 - 212:9 T 212:10 - 212:15 SC; F; K 212:16 - 212:17 T 212:18 - 212:23 SC; F; K; V 212:24 - 212:25 T 213:1 - 213:6 SC; F; K 213:7 - 213:7 T 213:8 - 213:12 SC; F; K 213:13 - 213:13 T 213:14 - 213:20 SC; F; K; S 213:21 - 213:22 T 213:23 - 214:18 SC; F; K; S; MIL 214:19 - 214:22 SC; F; K; S; MIL; R 214:23 - 215:4 SC; F; K; S; MIL; R 215:5 - 215:5 T	38:12 - 38:13

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	215:8 - 215:13 SC; F; K; S; MIL; R 215:14 - 215:16 T 215:17 - 215:19 SC; F; K; S; MIL; R 215:21 - 215:23 SC; F; K; S; MIL; R 215:24 - 216:1 T 216:2 - 216:6 SC; MIL; R 216:8 - 216:8 SC; MIL; R 216:9 - 216:9 T 216:11 - 216:11 SC; MIL; R 216:12 - 216:13 T 216:14 - 216:17 SC; MIL; R 216:19 - 216:20 SC; MIL; R; V; F; K; S 216:21 - 216:22 T 216:23 - 217:2 SC; MIL; R; V; F; K; S 217:3 - 217:10 T 217:12 - 217:13 SC; MIL; R; V; F; K; S 217:14 - 217:15 T 217:16 - 217:19 SC; MIL; R; V; F; K; S 217:20 - 217:21 T 217:22 - 219:25 SC; MIL; R; V; F; K; S; HR 220:1 - 220:2 T 220:3 - 220:10 SC; MIL; R; V; F; K; S; HR 220:11 - 220:11 T 220:12 - 220: 21 SC; MIL; R; V; F; K; S 220:22 - 220:22 Q; T 220:23 - 221:4 SC; MIL; R; V; F; K; S 221:5 - 221:6 Q; T 221:7 - 221:14 SC; MIL; R; V; F; K; S 221:15 - 221:15 Q; T 221:16 - 222:6 SC; MIL; R; V; F; K; S 222:7 - 222:7 Q; T 222:10 - 222:13 SC; MIL; R; V; F; K; S 222:14 - 222:14 Q; T 222:15 - 222:16 SC; MIL; R; V; F; K; S 222:18 - 222:21 SC; R; V	
225:9 – 247:19	225:9 - 225:10 R; 403 225:11 - 227:1 R; 403; HR; SC 227:2 - 227:2 T	38:19 - 38:21

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	227:3 - 227:9 R; 403; SC	
	227:10 - 227:10 T	
	227:11 - 227:23 R; 403; SC; F; K	
	227:24 - 227:25 T	
	228:1 - 228:6 R; 403; SC	
	228:7 - 228:7 T	
	228:8 - 229:13 R; 403; SC	
	229:14 - 229:14 T	
	229:15 - 230:2 R; 403; SC; F; K	
	230:3 - 230:3 T	
	230:4 - 230:9 R; 403; SC	
	230:10 - 230:10 T	
	230:11 - 230:15 R; 403; SC	
	230:16 - 230:16 T	
	230:17 - 231:2 R; 403; SC; F	
	231:3 - 231:4 T	
	231:5 - 231:8 R; 403; SC	
	231:9 - 231:10 T	
	231:11 - 231:14 R; 403; SC	
	231:15 - 231:15 T	
	231:16 - 231:18 R; 403; SC; F; K; S	
	231:19 - 231:20 T	
	231:21 - 232:2 R; 403; SC; F; K; S	
	232:3 - 232:3 T	
	232:4 - 232:8 R; 403; SC; F; K; S	
	232:9 - 232:9 T	
	232:10 - 232:21 R; 403; SC; F; K; S	
	232:22 - 232:22 T	
	232:23 - 233:3 R; 403; SC	
	233:4 - 233:5 T	
	233:6 - 233:8 R; 403; SC; F; K; S	
	233:9 - 233:10 T	
	233:11 - 233:14 R; 403; SC; F; K; S	
	233:15 - 233:15 T	
	233:16 - 233:22 R; 403; SC; F; K; S	
	233:23 - 233:24 T	
	233:25 - 234:8 R; 403; SC; F; K; S	
	234:9 - 234:10 T	
	234:11 - 234:20 R; 403; SC; F; K; S	
	234:21 - 234:22 T	
	234:23 - 235:16 R; 403; SC; F; K; S	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	235:17 - 235:19 T	
	235:20 - 235:25 R; 403; SC; F; K; S	
	236:1 - 236:1 T	
	236:2 - 236:6 R; 403; SC; F; K; S	
	236:7 - 236:7 T	
	236:8 - 236:12 R; 403; SC; F; K; S	
	236:13 - 236:14 T	
	236:15 - 236:20 R; 403; SC; F; K; S	
	236:21 - 236:23 T	
	236:24 - 237:3 R; 403; SC; F; K; S; V	
	237:4 - 237:5 T	
	237:6 - 237:11 R; 403; SC; F; K; S	
	237:12 - 237:13 T	
	237:14 - 237:20 R; 403; SC; F; K; S	
	237:21 - 237:23 T	
	237:24 - 238:4 R; 403; SC; F; K; S	
	238:5 - 238:7 T	
	238:8 - 238:16 R; 403; SC; F; K; S	
	238:17 - 238:18 T	
	238:19 - 238:23 R; 403; SC; F; K; S	
	238:24 - 238:25 T	
	239:1 - 239:5 R; 403; SC; F; K; S	
	239:6 - 239:7 T	
	239:8 - 239:16 R; 403; SC; F; K; S; P	
	239:17 - 239:20 T	
	239:21 - 239:24 R; 403; SC; F; K; S; P	
	239:25 - 240:23 T	
	240:24 - 241:5 T	
	241:6 - 241:16 R; 403; SC; F; K; S	
	241:17 - 241:23 T	
	241:24 - 241:24 R; 403; SC; F; K; S	
	241:25 - 242:5 T	
	242:6 - 242:10 R; 403; SC; F; K; S	
	242:11 - 242:13 T	
	242:14 - 242:16 R; 403; SC; F; K; S	
	242:17 - 242:18 T	
	242:19 - 242:23 R; 403; SC	
	242:24 - 243:3 T	
	243:4 - 243:14 R; 403; SC; LC; V	
	243:15 - 243:16 T	
	243:17 - 243:22 R; 403; SC; F; K; S	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	243:23 - 244:3 T 244:4 - 244:6 R; 403; SC 244:7 - 244:9 T 244:10 - 244:16 R; 403; SC 244:17 - 244:21 T 244:22 - 244:25 R; 403; SC 245:1 - 245:9 T 245:10 - 245:20 P; R; 403; SC; LC 245:21 - 245:23 T 245:24 - 246:2 P; R; 403; SC; LC 246:3 - 246:4 T 246:5 - 246:8 P; R; 403; SC; LC 246:9 - 246:11 T 246:12 - 246:16 P; R; 403; SC; LC 246:17 - 246:21 T 246:22 - 247:9 R; 403; SC; LC; M 247:10 - 247:14 T 247:15 - 247:19 R; 403; SC; LC	
251:4 – 16	251:4 - 251:4 R; 403; F; K; S 251:5 - 251:6 T 251:7 - 251:7 R; 403; F; K; S 251:8 - 251:8 T 251:9 - 251:13 R; 403; F; K; S 251:14 - 251:15 T 251:16 - 251:16 R; 403; F; K; S	38:24 - 39:9
260:1-261:9	260:1 - 260:12 F; K; S; HR 260:13 - 260:14 T 260:15 - 260:19 F; K; S; HR 260:20 - 260:20 T 260:21 - 260:24 F; K; S; HR 260:25 - 261:1 T 261:2 - 261:6 F; K; S; HR 261:7 - 261:8 T 261:9 - 261:9 F; K; S; HR	39:16 - 40:3
262:5-22	262:5 - 262:20 R; 403; HR; F; K 262:21 - 262:21 262:22 - 262:22 R; 403; HR; F; K	40:10 - 40:12
264:4-265:24	264:4 - 265:5 HR; R; F; K 265:6 - 265:7 T 265:8 - 265:14 HR; R; F; K	40:16 - 40:17

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	265:15 - 265:16 T 265:17 - 265:24 HR; R; F; K	
266:18 – 267:5	266:18 - 266:19 R; F; K; SC 266:20 - 266:20 T 266:21 - 266:23 R; F; K; SC 266:24 - 266:24 T 266:25 - 267:5 R; F; K; SC	40:21 - 41:5
269:16 - 276:16	269:16 - 270:10 F; K; SC; R 270:11 - 270:13 T 270:14 - 270:21 F; K; SC; R 270:22 - 270:23 T 270:24 - 271:21 F; K; SC; R; M 271:22 - 271:23 T 271:24 - 272:6 F; K; SC; R 272:7 - 272:8 T 272:9 - 272:22 F; K; SC; R 272:23 - 272:24 SC 272:25 - 273:6 F; K; SC; R 273:7 - 273:8 T 273:9 - 273:15 F; K; SC; R 273:16 - 273:17 T 273:18 - 273:24 F; K; SC; R 273:25 - 274:2 T 274:3 - 274:11 F; K; SC; R 274:23 - 275:1 F; K; SC; R 275:2 - 275:3 T 275:4 - 275:9 F; K; SC; R 275:10 - 275:11 T 275:12 - 275:16 F; K; SC; R 275:17 - 275:18 T 275:19 - 275:25 F; K; SC; R 276:1 - 276:2 T 276:3 - 276:16 F; K; SC; R	62:18 - 63:19
286:9 – 300:23	286:9 - 288:15 R; 403; HR 288:16 - 288:16 T 288:17 - 288:22 R; 403; HR; SC 288:23 - 288:24 T 288:25 - 290:5 R; 403; HR 290:6 - 290:7 T 290:8 - 290:23 R; 403; HR	68:8 - 68:11

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	290:24 - 290:24 T	
	290:25 - 291:4 R; 403; HR	
	291:5 - 291:5 T	
	291:6 - 293:1 R; 403; F; K; S	
	293:2 - 293:3 T	
	293:5 - 293:12 R; 403; F; K; S	
	293:13 - 293:13 T	
	293:14 - 293:18 R; 403; F; K; S; SC	
	293:19 - 293:19 T	
	293:20 - 293:24 R; 403; F; K; S	
	293:25 - 294:1 T	
	294:2 - 294:7 R; 403; F; K; S	
	294:8 - 294:8 T	
	294:9 - 294:22 R; 403; F; K; S	
	294:23 - 294:23 T	
	294:24 - 295:6 R; 403; F; K; S	
	295:7 - 295:7 T	
	295:8 - 295:14 R; 403; F; K; S; HR	
	295:15 - 295:15 T	
	295:16 - 295:22 R; 403; F; K; S; HR	
	295:23 - 295:24 T	
	295:25 - 296:5 R; 403; F; K; S; M; HR	
	296:6 - 296:7 T	
	296:8 - 296:20 R; 403; F; K; S; HR	
	296:21 - 296:21 T	
	296:22 - 297:6 R; 403; F; K; SC	
	297:7 - 297:7 T	
	297:8 - 297:13 R; 403; F; K; S; HR	
	297:14 - 297:14 T	
	297:15 - 297:23 R; 403; F; K; S; M	
	297:24 - 297:25 T	
	298:1 - 298:11 R; 403; F; K; S; HR	
	298:12 - 298:12 T	
	298:13 - 298:18 R; 403; F; K; S; HR	
	298:19 - 298:19 T	
	298:20 - 299:12 R; 403; F; K; S; HR; SC	
	299:13 - 299:14 T	
	299:15 - 299:16 R; 403; F; K; S; SC	
	299:18 - 299:21 R; 403; F; K; S	
	299:22 - 299:22 T	
	299:23 - 300:4 R; 403; F; K; S; SC	

Objection Legend

IO - Improper opinion

R - Irrelevant

403 - FRE 403

K - Lack of personal knowledge

S - Calls for speculation

A - Assumes facts not in evidence

LC - Calls for legal conclusion

SC - Outside scope of 30(b)(6) topics/deposition

C - Compound

M - Mischaracterizes testimony

F - Lack of foundation

HR - Hearsay

MIL - Subject of pending motion in limine

T - Not testimony

H - Improper/incomplete hypothetical

Q - Not a question

V - Vague

P - Calls for Privileged Information

Plaintiff's Designations	Defendants' Objections to Plaintiff's Designations	Defendants' Counter Designations
	300:5 - 300:7 T 300:8 - 300:23 R; 403; F; K; S; SC	
302:19 – 307:6	302:19 - 303:5 R; 403; F; K; S; V 303:6 - 303:7 T 303:8 - 303:25 R; 403; F; K; S; V; HR 304:1 - 304:1 T 304:2 - 304:14 R; 403; F; K; S; V; HR 304:15 - 304:15 T 304:16 - 305:5 R; 403; F; K; S; V; HR 305:6 - 305:6 T 305:7 - 305:11 R; 403; F; K; S; V 305:12 - 305:13 T 305:14 - 305:22 R; 403; F; K; S; V; HR 305:23 - 305:23 T 305:24 - 306:21 R; 403; F; K; S; V; HR 306:22 - 307:3 R; 403; F; K; S; V; HR 307:4 - 307:4 T 307:5 - 307:6 R; 403; F; K; S; HR	68:13 - 68:14
313:1-11	313:1 - 313:2 SC; V; MIL 313:3 - 313:4 T 313:5 - 313:11 SC; V; MIL	68:16 - 68:23
		69:3 - 69:7
		72:18 - 72:20
		72:23 - 73:2
		80:11 - 80:12
		80:14 - 80:18
		238:22 - 238:23
		239:1 - 239:5
		239:8 - 239:13
		322:17 - 323:16

Objection Legend

IO - Improper opinion
R - Irrelevant
403 - FRE 403
K - Lack of personal knowledge
S - Calls for speculation
A - Assumes facts not in evidence

LC - Calls for legal conclusion
SC - Outside scope of 30(b)(6) topics/deposition
C - Compound
M - Mischaracterizes testimony
F - Lack of foundation
HR - Hearsay

MIL - Subject of pending motion in limine
T - Not testimony
H - Improper/incomplete hypothetical
Q - Not a question
V - Vague
P - Calls for Privileged Information

Dated: New York; NY
May 4; 2022

/s/ Dale M. Cendali

Dale M. Cendali (admitted *pro hac vice*)
Joshua L. Simmons (admitted *pro hac vice*)
Chris Ilardi (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com
joshua.simmons@kirkland.com
chris.ilardi@kirkland.com

Miranda D. Means (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
200 Clarendon Street
Boston, Massachusetts 02116
Telephone: (617) 385-7500
miranda.means@kirkland.com

Matthew J. Cavanagh (OH 0079522)
MCDONALD HOPKINS LLC
600 Superior Avenue; East; Ste. 2100
Cleveland, Ohio 44114
Telephone: 216.348.5400
Fax: 216.348.5474
mcavanagh@mcdonaldhopkins.com

*Attorneys for Defendants 2K Games; Inc. and
Take-Two Interactive Software; Inc.*